



HOWMET ALUMINUM CORPORATION
MILL PRODUCTS DIVISION

Box 3167, Lancaster, Pennsylvania 17604 (717) 393-9641 Telex: 84-8436

RECEIVED
January 18, 1984 Facilities Management Section

JAN 25 1984

U.S. EPA, Region III

Mr. Robert G. Benvin
Facilities Supervisor
Dept. of Environmental Resources
407 South Cameron Street
Harrisburg, PA 17101

Dear Mr. Benvin:

Subject: EPA-ID #PAD049029697
Part B Application for Hazardous Waste Facility

In reply to your letter dated 28 Dec. '83 concerning certain deficiencies for subject, we will list them in the order presented:

1. Elevation Contours - 6 copies of Huth Engineers' Dwg. #E-5636-AA-2123, sheet 13 are enclosed. Contour intervals are 1 foot. Grids are 100 feet square. Scale is 1" = 20 ft. The pertinent facility is the 10,000 gallon paint/solvent waste tank highlighted in yellow.
2. Surface Water Management - Same drawing as in (1) above. Storm (surface) drains (S.D.) & surface inlets #26 thru #29 apply to this area.
3. Containment Structure - 6 copies of Howmet Dwg. #D-2259 enclosed. There were no calculations involved in the design of the containment, but it is similar to other installations in the plant. The containment volume - 1,346 cu. ft. is slightly greater than the tank - 1,337 cu. ft.
4. Vector, Odor, & Noise Control Plan - Since this is a system of closed piping and a tank, these items do not apply.

(continued)

Mr. Robert G. Benvin
Dept. of Environmental Resources
January 18, 1984

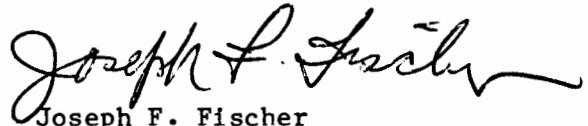
Page 2

5. Tank Evaluation & Repair Plan - The tank contents are non-corrosive. The tank outside is kept in good painted condition. The tank, piping, containment, and accessories are inspected once/week - see Exhibit M - "Inspection Record".

We trust that this satisfactorily completes our application.

Very truly yours,

HOWMET ALUMINUM CORPORATION



Joseph F. Fischer
Environmental Engineer
Mill Products Division

JFF:11
encl.

cc: G. Lanza
M. Meyer
B. Rupp
S. Kirchner
W. Ray Cunningham - EPA

BUREAU OF SOLID WASTE MANAGEMENT
407 South Cameron Street
Harrisburg, Pennsylvania 17101
(717) 787-9697
December 28, 1983

Mr. Joseph F. Fischer
Howmet Aluminum Corporation
Mill Products Division
1480 Manheim Pike
Lancaster, PA 17601

Re: EPA ID #PAD 049029697
Part B Application for
Hazardous Waste Facility

Dear Mr. Fischer:

We have conducted a preliminary review of your Part B permit application received at this office on April 8, 1983. This phase of our review was conducted to determine if information submitted in your application was complete in accordance with the Department's Rules and Regulations and the Hazardous Waste TSD Application Checklist.

After reviewing the submitted material, we have determined that the application is deficient in the following areas:

1. Elevation contours are not shown on the site drawing (D-1754) as required by Section 75.265(z)(18)(ii) of the Department's Hazardous Waste Management Regulations.
2. Details relating to surface water management are not shown or addressed on the site drawing as required by Section 75.265(z)(21)(ii).
3. Information relating to containment structure design, including calculations, has not been provided. This is referenced in Section 75.264(r)(6).
4. A vector, odor, and noise control plan has not been included as required by Section 75.264(r)(34).
5. A Tank Evaluation and Repair (TER) plan has not been included. This is referenced in Section 75.264(r)(23).

Mr. Joseph F. Fischer
December 28, 1983
Page 2

Information addressing and correcting these deficiencies should be submitted to this office with five copies within twenty-one (21) days of the date of this letter. Upon receipt of this information at this office, technical review of the application will begin. You will be informed of the status once the technical review is completed. We may request additional information or schedule a site visit if necessary to further evaluate the application.

If you have any questions, please contact this office.

Sincerely,

Robert G. Benvin
Facilities Supervisor
Harrisburg Regional Office

RGB:jsm

cc: Environmental Protection Agency

HOWMET

HOWMET ALUMINUM CORPORATION

MILL PRODUCTS DIVISION

Box 3167, Lancaster, Pennsylvania 17604 (717) 393-9641 Telex: 84-8436

August 3, 1983

Abdul R. Merchant
Solid Waste Engineer
Department of Environmental Resources
407 South Cameron St.
Harrisburg, Pa. 17101
Subject: Module 9 - Part B Application - EPA ID
no. PAD049029697

Dear Mr. Merchant:

In compliance with Penna. Title 25, chapter 75, paragraph 75.265 (Z) (18) (iv), we are enclosing 6 copies each of Module 9, Part A completed, with question #3 and a section of Lancaster, Pa. 7-1/2 minute topographic map as attachments.

Very truly yours,

HOWMET ALUMINUM CORPORATION


J. F. Fischer
Environmental Engineer

JFF/ld
Enclosure

cc: B. Rupp
S. Kirchner
W. Ray Cunningham/EPA ✓

RECEIVED

AUG 05 1983

**AIR & WASTE MANAGEMENT
DIVISION
EPA REGION III**

Commonwealth of Pennsylvania
Department of Environmental Resources
Bureau of Solid Waste Management

Date Prepared: 3 Aug. 83 I.D. Number: PAD049029697

GENERAL ENVIRONMENTAL, SOCIAL AND ECONOMIC INFORMATION

MODULE NO. 9

Prepared by: Joseph F. Fischer - Environmental Engineer
Howmet Aluminum Corp. - Mill Products Div. - 1480 Manheim Pike, Lancaster, Pa.
17604

This module is to be completed and submitted with applications for the following:

- 1) Municipal Waste Landfills including:
 - a) new landfills;
 - b) an expansion, enlargement or alteration of the facility beyond the original design capacity or beyond the area specified in the permit obtained from the Department;
 - c) existing landfills where the permit is to be revised, modified or re-issued to reflect the application of technology which is significantly different than that previously permitted by the Department.
- 2) Municipal waste (Class V) incinerators.
- 3) Residual waste landfills and expansions thereof.
- 4) Non-captive hazardous waste treatment and disposal facilities.
- 5) Captive hazardous waste treatment and disposal facilities which are not located at the facility where the waste is generated.
- 6) Other individual permit applications at the discretion of the Bureau of Solid Waste Management when a particular project appears to have a significant effect on environmental values.

NOTE: *Construction and demolition waste landfills, agricultural utilization of sewage sludge, commercial waste incinerators and hospital incinerators are not included.*

The purpose of this module is to obtain information to assist the Department in evaluating the potential impact of a proposed project on the natural, scenic, historic and aesthetic values of the environment, in accordance with Article I, Section 27 of the Pennsylvania Constitution. A positive response to a particular question will not necessarily indicate significant environmental harm nor result in the denial of a permit. The actual determination of whether the potential for significant environmental harm exists will be made by the Department after consultation with the applicant and other concerned governmental agencies. If the Department determines that there may be a significant impact on natural, scenic, historic or aesthetic values of the environment, the Department will consult with the applicant to examine ways to reduce the environmental harm to a minimum. If, after consideration of mitigation measures, the Department finds that significant environmental harm will occur, the Department will evaluate the public social and economic benefits of the project to determine whether the harm outweighs the benefits.

Part A must be completed by all applicants. Part B should be completed by applicants who determine that the potential for significant environmental harm exists. The Department may request more detailed information on environmental, social, and economic impacts, if necessary.

- A. The following questions request information concerning the potential impact of the proposed facility on natural, scenic, historic, and aesthetic values of the environment. Circle the appropriate answer. Map requested information on a U.S.G.S. 7.5 minute topographic quadrangle map where possible. Use additional paper to provide written responses.

1. Is the project located in the corridor of a stream or river designated as a national or state wild, scenic, recreational, or modified recreational river in accordance with the National Wild and Scenic Rivers Act of 1968, or the Pennsylvania Scenic Rivers Act?

Yes ☐ No ☒

If yes,

- a) Identify the river, the outline of the designated corridor, and the location of the project within the corridor.
- b) Describe how the project conforms to the Land Management Guidelines and Studies or Plans for the corridor.

2. Is the project located within one mile of the nearest bank of a stream or river listed as a 1-A priority for study by the Pennsylvania Department of Environmental Resources as a state wild, scenic, recreational, or modified recreational river; or mandated by the U.S. Congress for study or determined by the U.S. Heritage Conservation and Recreation Service to meet the criteria for study for potential inclusion into the National Wild and Scenic Rivers System?

Yes ☐ No ☒

If yes,

- a) Identify the river or stream and its distance from the project.
- b) Conduct visual and traffic analyses as specified in the applicant guidelines.
- c) Describe the characteristics of the project which might create adverse environmental, visual, or traffic impacts on or in the vicinity of the river or stream.
- d) Describe measures to be taken to minimize adverse impacts on the river or stream.

3. Is the project located within one mile of a unit of the National Parks System; a state, county, or municipal park; a recreation facility operated by the U.S. Army Corps of Engineers; a state forest picnic area; or the Allegheny River Reservoir in the Allegheny National Forest?

Yes ☒ No (See attachments)

If yes,

- a) Identify the park or other area and its distance from the project.
- b) Conduct visual and traffic analyses as specified in the applicant guidelines.
- c) Describe the characteristics of the project which might create adverse environmental, visual, or traffic impacts on the park or other area.
- d) Describe measures to be taken to minimize adverse impacts on the park or other area.

4. Is the project located within one mile of the footpath of the Appalachian Trail?

Yes

No

If yes,

- Indicate the distance from the project to the Appalachian Trail.
 - Conduct visual and traffic analyses as specified in the applicant guidelines.
 - Describe the characteristics of the project which might create adverse environmental, visual, or traffic impacts on the Appalachian Trail.
 - Describe measures to be taken to minimize adverse impacts on the Appalachian Trail.
5. Is the project located within one mile of a national natural landmark designated by the U.S. National Park Service; or a natural area or wild area designated by the Pennsylvania Environmental Quality Board?

Yes

No

If yes,

- Identify the natural landmark, natural area, or wild area and its distance from the project.
 - Conduct visual and traffic analyses as specified in the applicant guidelines.
 - Describe the characteristics of the project which might create adverse environmental, visual, or traffic impacts on the natural landmark, natural area, or wild area.
 - Describe measures to be taken to minimize adverse impacts on the natural landmark, natural area, or wild area.
6. Is the project located within one mile or within an identified potential impact area of a national wildlife refuge, national fish hatchery, or national environmental center operated by the U.S. Fish and Wildlife Service?

Yes

No

If yes,

- Identify the wildlife refuge, fish hatchery, or environmental center and its distance from the project.
- Conduct visual and traffic analyses as specified in the applicant guidelines.
- Describe the characteristics of the project which might create adverse environmental, visual, or traffic impacts on the wildlife refuge, fish hatchery, or environmental center.
- Describe measures to be taken to minimize adverse impacts on the wildlife refuge, fish hatchery, or environmental center.

7. Is the project located within one mile of an historic property owned by the Pennsylvania Historical and Museum Commission?

Yes

No

If yes,

- Identify the historic property and its distance from the project.
- Conduct visual and traffic analyses as specified in the applicant guidelines.
- Describe the characteristics of the project which might create adverse environmental, visual, or traffic impacts on the historic property.
- Describe measures to be taken to minimize adverse impacts on the historic property.

8. Is the project located within 1/4 mile of an historic site listed in the National Register of Historic Places or the Pennsylvania Inventory of Historic Places; or an archaeological site listed in the Pennsylvania Archaeological Site Survey?

Yes

No

If yes,

- Identify the historic or archaeological site, and its distance from the project.
- Describe the characteristics of the project which might create adverse impacts on the historic or archaeological site.
- Describe measures to be taken to minimize adverse impacts on the historic or archaeological site.
- Indicate any contact you have had with the Pennsylvania Historical and Museum Commission about the project.

9. Is the project within 1/4 mile of the boundary of a state forest or state game land; or the proclamation boundary of the Allegheny National Forest?

Yes

No

If yes,

- Identify the forest or game land and its distance from the project.
- Describe the characteristics of the project which might create adverse impacts on the forest or game land.
- Describe measures to be taken to minimize adverse impacts of the project on the forest or game land.

10. Is the project located within an area which is a habitat of a rare, threatened, or endangered species of plant or animal protected by the Federal Endangered Species Act of 1973, or recognized by the Pennsylvania Fish Commission or Pennsylvania Game Commission?

Yes

No

If yes,

- Identify the species and the habitat area and the location of the project within the area.
- Describe the characteristics of the project which might create adverse impacts on the species or habitat.
- Describe measures to be taken to minimize adverse impacts on the species or habitat.
- Describe any contact you have had with the Pennsylvania Fish Commission, Pennsylvania Game Commission, Pennsylvania Historical & Museum Commission, or U.S. Fish and Wildlife Service about the project.

11. Is the project located on prime farmland (Class I and II soils) as indicated in the U.S. Soil Conservation Service County Soil Survey?

Yes

No

If yes, identify the location and acreage of prime farmland and the location of the project.

12. Is the project located within a wetland?

Yes

No

If yes,

- Identify the location and size of the wetland and the location of the project.
- Is a permit required for the project, for filling or dredging the wetland, under Section 404 of the Federal Clean Water Act?
- Describe any contact you have had with the U.S. Army Corps of Engineers or the U.S. Fish and Wildlife Service about the project.
- Is a permit required for the project for a dam or waterway obstruction in the wetland, under Chapter 105 of the Rules and Regulations of Pennsylvania Department of Environmental Resources?

13. Is the project located within a Special Protection Watershed, as designated in Chapter 93 of the Rules and Regulations of the Pennsylvania Department of Environmental Resources?

Yes

No

If yes,

- Identify the stream and watershed, and the distance of the stream from the project.
- Describe the characteristics of the project which might create adverse impacts on the stream.
- Describe measures to be taken to minimize adverse impacts on the stream.

14. Is the project located within the watershed or aquifer, and within one mile of a public water supply facility dependent on groundwater sources; or upstream, within the watershed, and within three miles of a public water supply facility dependent on surface sources?

Yes

No

If yes,

- Identify the public water supply facility, and its supply source; locate both on a topographic map; and indicate their distances from the project.
- Briefly describe the public water supply facility, including capacity and population served.
- Describe measures to be taken to protect the public water supply facility from any potential harm.

15. Is the project located within a 100-year floodplain as indicated on a Flood Boundary and Floodway Map contained in a flood insurance study prepared by the Federal Insurance Administration, or as determined by some other method if a Flood Boundary and Floodway Map is not available?

Yes

No

If yes,

- Is the project located in the floodway, based on available detailed studies?
- Is a permit required for the project under Chapter 105 of the Rules and Regulations of the Pennsylvania Department of Environmental Resources?
- Describe any contacts you have had with the Bureau of Dams and Waterway Management about the project.
- Is a permit required by the local municipality under the Floodplain Management Act?
- Describe any contact you had had with the municipality about the project.

16. Will the project, absent control measures, result in an increase in the peak discharge rate for stormwater drainage from the project site?

Yes

No

If yes,

- Describe the amount of increase in the peak discharge rate for stormwater drainage.
- Describe adverse impacts that might result from the increase in peak discharge rate for stormwater drainage.
- Describe measures to be taken to minimize adverse impacts from the increase in the peak discharge rate for stormwater drainage.

If no, provide documentation supporting this judgment.

17. Is the project located in a landslide, sinkhole, or mine-subsidence prone area?

Yes

No

If yes,

- Identify the geologic hazard and the location of the project.
- Indicate how the geologic hazard will affect the project.
- Describe engineering and design measures to be taken to minimize the geologic hazard to the project and prevent an increase in danger from the hazard to other property owners in the vicinity.

18. Will the project create an increase in traffic on the approach route(s) leading to the project?

Yes

No

If yes,

- Identify the approach route(s) to the project site, and describe them in terms of:
 - design capacities, roadway width and condition;
 - average daily traffic counts (if available from Pennsylvania Department of Transportation);
 - hazardous grades or curves.
- Describe the expected traffic increase; include number, type, size and weight of vehicles and distribution on approach routes.
- Identify and indicate number of residences fronting (50 feet setback or less) on approach route(s) to the project site.
- Identify any schools, hospitals, or nursing homes located on the approach route(s) to the project site.
- Describe any special routing or timing of traffic to the project site to be provided to minimize conflict with other traffic or to prevent safety hazards. Traffic impacts analyzed for previous questions should be briefly mentioned.

19. If the project is a solid waste disposal facility disposing of putrescible wastes,

- Is it located within 10,000 feet of a public use airport runway used by turbo jet aircraft?

Yes

No

N/A

- Is it within 5,000 feet of a public use airport runway used by only piston-type aircraft?

Yes

No

N/A

If yes, identify the airport and its distance from the project.

- B. If the Department finds that the project will cause unavoidable significant environmental harm, the Department will then determine whether the harm outweighs the public social and economic benefits of the project. The following questions request information regarding social and economic benefits.

- Indicate the counties and/or municipalities which will comprise the service area of the project*, and the estimated proportion of the total volume and type of solid wastes which will come from each.

- Describe how wastes will be transported from their source to the project (include mode & handling enroute).

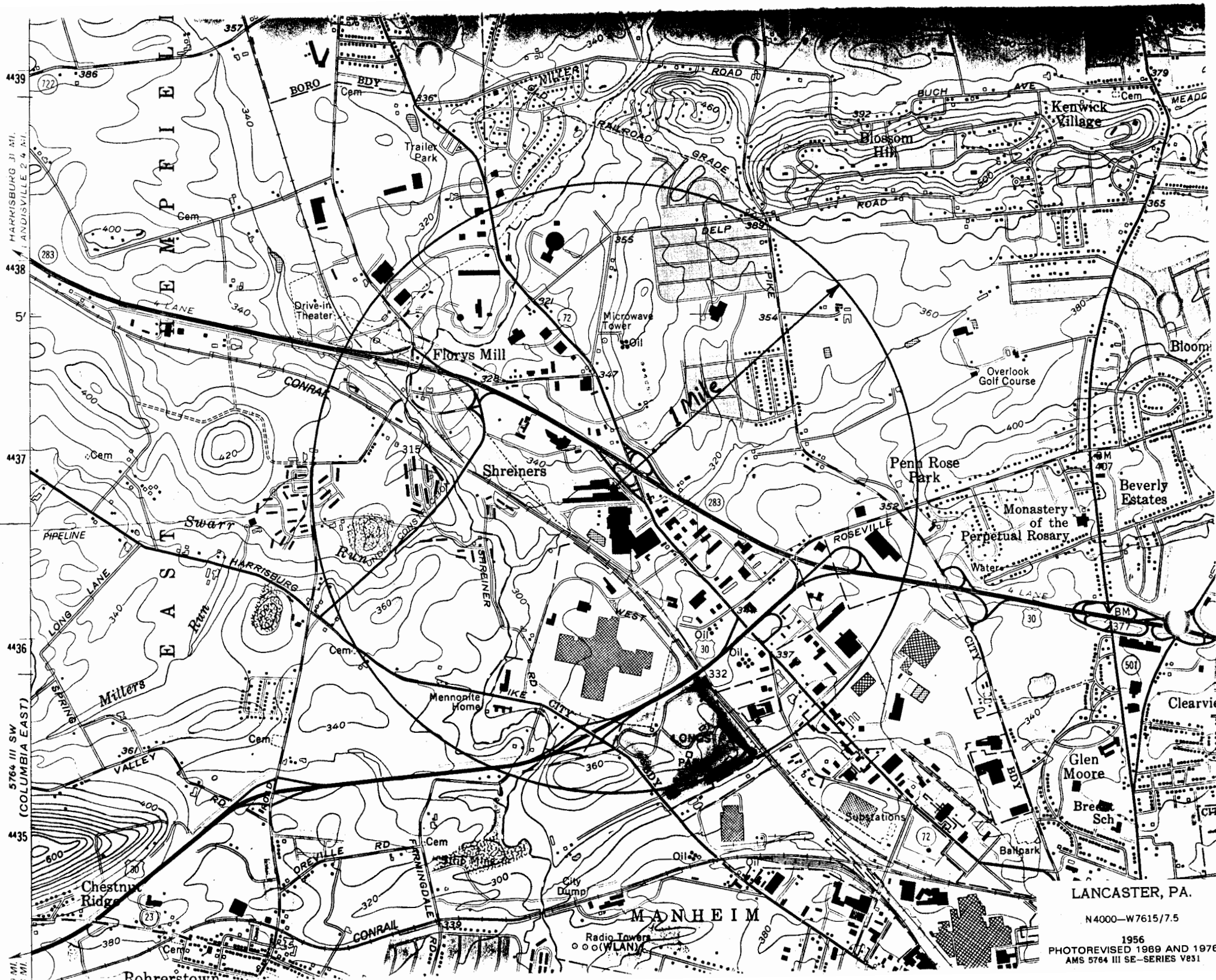
3. Is the project consistent with local, county or regional solid waste plans, if such plans exist? Indicate which plans have been consulted and explain why the project is or is not consistent with each.
4. What factors indicate the need for the project in the identified service area? Cite local plans, if applicable; present and future expected solid waste volumes and their sources within the service area; adequacy of existing facilities to meet present and future needs, etc.
5. If the project will handle industrial wastes, indicate the types of industries which need disposal services, number of establishments to be served, general locations of establishments, employment in these establishments, and their economic importance. Describe why these wastes are not presently being handled adequately. What will be the impact on industries if a disposal facility is not available?
6. Describe factors (such as location, transportation, geology, etc.) which make the proposed project site well-suited to serve the needs described above. Compare the proposed site with other potential sites which have been considered, or which may be available within, or reasonably close to, the service area.
7. What revenues will be generated by the project for local jurisdictions (counties, local governments, school districts, etc.) in the form of fees, taxes, royalties, etc.? List type, amount and frequency of payment (yearly, monthly, one-time, etc.).
8. How many people will be employed directly in operating the project and what are their occupations? What will the estimated yearly payroll (in present dollars) be for the project.
9. Include any additional relevant information which would indicate the public social and economic benefits to be provided by the project.

**Service area is that area or areas in which wastes handled at the project will be generated.*

Module 9
Part A
Question #3

- a) Long's Park (municipal) is 3,500 feet from Howmet's facility. See attached section of Lancaster, Pa. 7-1/2 minute topographic map.
- b) 1.) Visual analysis: Neither Howmet's facility (yellow highlight), nor Long's Park (blue highlight) is visible to the other because of topography, and physical obstructions between them. The facility is an existing 10,000 gallon paint/solvent waste tank, installed in 1972 located on the East-central cross mark on the map.
- 2.) Traffic analysis: There are no impacts from vehicular traffic involved.
- c) & d) Same as b) 1.) & 2.) above.

J. F. Fischer
3 Aug. 83



LANCASTER, PA.

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HOWMET

HOWMET ALUMINUM CORPORATION
MILL PRODUCTS DIVISION

Box 3167, Lancaster, Pennsylvania 17604 (717) 393-9641 Telex: 84-8436

File
Hanks

18 July 83

Abdul R. Merchant
Solid Waste Engineer
Department of Environmental Resources
407 South Carmen St.
Harrisburg, Pa. 17101

Subject: Part B Application - EPA I.D. No. 049029697

Dear Mr. Merchant:

We are in receipt of your letter dated 12 July 83 concerning Module 9 of the Part B application for a RCRA permit.

Please note that on the Module 9, and the Guidelines for same, Module 9 is required for:

1. Municipal Waste Landfills
2. Municipal waste incinerators
3. Residual waste landfills
4. Hazard Waste Treatment & Disposal Facilities
5. Other applications where a particular project appears to have a significant effect on environmental values.

Our facility is a well-constructed, protected, and maintained 10,000 gallon STORAGE tank for paint solvent waste, which is reclaimed by an outside vendor. None of the above 5 categories pertain to our installation, and Module 9 is therefore not applicable to it.

RECEIVED

JUL 20 1983

ENVIRONMENTAL
HAZARDOUS MATERIALS BRANCH



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

JUN 24 1983

Mr. Joseph F. Fischer
Environmental Engineer
Howmet Aluminum Corporation
Mill Products Division
Box 3167
Lancaster, PA 17604

Re: I.D. Number: PAD 04 902 9697
Part B Application

Dear Mr. Fischer:

Thank you for the recent copy of a permit application. Since the Environmental Protection Agency (EPA) has not yet initiated the formal action of calling in the federal Part B Permit Application (Part B) of your facility, it is our understanding that you provided us with a courtesy copy of your submittal to the Pennsylvania Department of Environmental Resources for information purposes only. If you wish a federal permit, the EPA regulations under the Resource Conservation and Recovery Act (RCRA) require that the following procedures be generally followed.

An existing interim status facility that has been requested by EPA to submit a Part B is allowed at least 6 months to submit the required data to EPA. EPA then has 60 days from the date of receipt of a Part B submittal in which to notify the facility whether or not the application is complete. If it is not, EPA issues a Notice of Deficiency advising the facility what must be submitted for the application to be determined to be complete. The facility then has 30 days in which to submit the required information; otherwise, it will be subject to an enforcement action and possible loss of interim status.

EPA has not called in your Part B, nor have you notified EPA that your submittal should be considered a formal RCRA permit application. Therefore, EPA will not process your application until your Part B is called in by EPA or you request in writing that your submittal be considered a formal RCRA permit application. At such time, your application will be reviewed subject to the procedures described above.

If you have any questions regarding this letter, please contact Jack Potosnak of my staff at (215) 597-0961.

Sincerely yours,

W. Ray Cunningham
Acting Chief, Waste Management Branch

cc: A. Dalberto
PA-DER



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF SOLID WASTE MANAGEMENT
407 South Cameron Street
Harrisburg, Pennsylvania 17101
(717) 787-9697
November 5, 1982



Howmet Aluminum Corporation
Mill Products
1480 Manheim Pike
Lancaster, PA 17601

Re: EPA Identification No. PAD 04 902 9697

Gentlemen:

This letter constitutes a formal request for Part B of your Application for a Hazardous Waste Management Facility Permit under the Hazardous Waste Management Regulations, 25 PA Code Chapter 75, Subchapter D, for the facility referenced above. This request is made under the authority of Section 75.265(z)(6) of the regulations. You should refer to the Hazardous Waste Management Regulations that appeared in the Pennsylvania Bulletin dated September 4, 1982, which was recently mailed to you, for the requirements of the Part B Application. Your Part B Application must be submitted no later than six months from the date of this notice. If there is information that is being claimed as confidential, indicate this according to the requirements of Section 75.265(z)(16).

Enclosed are reference checklists for your Part B Application that are to be used to insure your application contains the minimum information required. These checklists are to be used to assist you in your Part B Application and our subsequent review, although the checklists are not a substitute for reviewing and addressing the hazardous waste regulations themselves. Because you may be anticipating additional facilities at your location, we have included checklists for every type of facility covered by the Department requirements. Please use only those checklists that apply to the types of facilities for which you are making application.

Your Part B Application will be reviewed for a Hazardous Waste Management TSD Permit by both the U. S. Environmental Protection Agency and the Department of Environmental Resources until the Commonwealth of Pennsylvania receives Phase II Interim Authorization under the RCRA Program to solely administer a permitting program.

Howmet Aluminum Corporation
Mill Products
November 5, 1982
Page 2

You should submit the Part B Application to both agencies for their concurrent review. This would require that the hazardous waste requirements under Pennsylvania regulations as well as the hazardous waste management requirements under the Federal program would have to be addressed.

When completed, please transmit your application and five copies (or seven copies if there is an incineration facility) to our office, and if you have any questions or desire to have a pre-application conference, please contact us.

Sincerely,

Edward R. Simmons
Regional Solid Waste Manager
Harrisburg Regional Office

ERS:jrm

Enclosures

cc: Shirley Bulkin, EPA



HOWMET ALUMINUM CORPORATION
MILL PRODUCTS DIVISION

Box 3137, Lancaster, Pennsylvania 17604 (717) 393-9641 Telex: 84-8436

April 6, 1983

Mr. Edward R. Simmons
Regional Solid Waste Manager
Department of Environmental Resources
407 South Cameron Street
Harrisburg, Pennsylvania 17101

Subject: EPA ID NO. PAD049029697 - Part B OF APPLICATION FOR RCRA PERMIT

Dear Mr. Simmons:

As required by Pennsylvania's Hazardous Waste Management Regulations, 25 PA Code, Chapter 75, Subchapter D, we are enclosing an original and five (5) copies for subject, consisting of:

- a.) Title sheet sealed and signed by Registered Professional Engineer.
- b.) Hazardous Waste TSD Application Checklist - 12 pages.
- c.) Signed and notarized certification sheet.
- d.) Module 10 - Compliance History - 9 pages.
- e.) Module 10 - Exhibits A thru E - 5 pages.
- f.) Exhibits F thru Q required by pages 2 thru 12 of Checklist - 35 pages.
- g.) Polaroid photo of tank referred to in Exhibit L.
- h.) Drawing D-1754 with General Requirements -(pages 2 thru 4 of Checklist) featured, and P.E. Seal.
- i.) \$1,000 Check - Application fee for storage facility.

One complete copy is being sent to Shirey Bulkin, EPA Region III - Philadelphia, Pennsylvania.

Please direct any inquiries to Joseph F. Fischer, Environmental Engineer - Howmet.

Very truly yours,

HOWMET ALUMINUM CORPORATION

Joseph F. Fischer
Environmental Engineer
Mill Products Division

JFF/cds

ENCLOSURES: 1 Original & 5 Copies

cc: G. Lanza

M. Meyer

R. Beck

B. Rupp

S. Kirchner

Shirley Bulkin/EPA

A MEMBER OF THE PECHINEY UGINE KUHLMANN GROUP

HAZARDOUS WASTE TREATMENT, STORAGE, AND DISPOSAL

PART B APPLICATION

FOR

HOWMET ALUMINUM CORP.

MILL PRODUCTS DIVISION

ROUTES 72 & 283

LANCASTER, PENNSYLVANIA

TELEPHONE (717) 393-9641

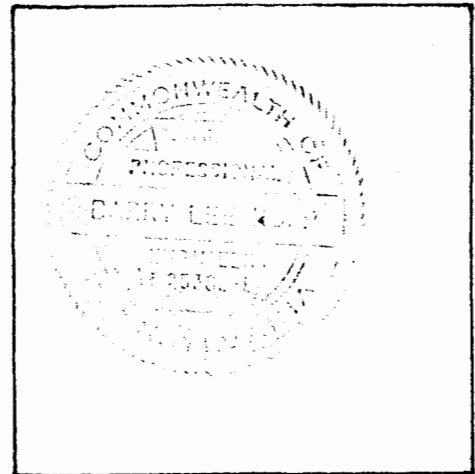
Certification:

Engineer BARRY LEE RUPP

Signature Barry Lee Rupp

Lic. No. 025382-E State PA.

Date 6, APRIL 1983



(SEAL)

HAZARDOUS WASTE TSD APPLICATION CHECKLIST

Page 1 of 12

GENERAL REQUIREMENTS

For: Containers
Tanks
Waste Piles

Thermal Treatment
Incinerators
Chemical, Physical, or Biological Treatment

Facility Name Howmet Aluminum Corporation
ID Number PAD049029697
Facility Location Lancaster, PA

REQUIREMENTS	SECTION	Provided	Not Provided	Not Applicable	COMMENTS
1. Part A Application for all new facilities and facilities which are proposing modifications to their interim status permit. Form ER-SWM-59			X		Part A application submitted 15 July 1981.
2. Environmental Assessment Report - Module 9	(265)(z)(18)(iv)		X	X	Storage tank only.
3. Compliance History Report - Module 10	(265)(z)(18)(v)	X			
4. Land Owner Consent Form	Act 97 Sec. 405			X	
5. Certification					
A. Registered Professional Engineer seal on all reports and design drawings	(265)(z)(19)	X			
B. Registered Professional Engineer seal and signature on title sheet	(265)(z)(19)	X			
C. Certification paragraph with responsible official's signature	(265)(z)(13)(iii)	X			
D. Signature of Principal Executive Officer or acceptable substitute	(265)(z)(13)(i)	X			
6. Application Fees, check payable to Commonwealth of Pennsylvania	(265)(z)(26)	X			
A. Storage \$1,000	(265)(z)(26)(i)	X			
B. Waste Piles \$1,000	(265)(z)(26)(iii)			X	
C. Thermal treatment \$2,000	(265)(z)(26)(vi)			X	
D. Chemical, physical, and biological treatment \$2,500	(265)(z)(26)(vii)			X	
E. Incinerators \$2,500	(265)(z)(26)(viii)			X	

GENERAL REQUIREMENTS (Continued)

GENERAL REQUIREMENTS (Continued)						Facility Name	Howmet Aluminum Corp.
For: Containers	Thermal Treatment	Provided	Not Provided	Not Applicable	ID Number	PAD049029697	
Tanks	Incinerators				Facility Location	Lancaster, PA	
Waste Piles	Chemical, Physical, or Biological Treatment	REQUIREMENTS	SECTION	COMMENTS			
7.	Operational Concept Report, including descriptions of:	(265)(z)(18)(i)	X			Exhibit F - (7A thru 7E)	
	A. Hazardous waste facility and its relationship to the installation		X				
	B. General facility description		X				
	C. Daily operational methodology		X				
	D. Expected waste types, sources and volumes		X				
	E. Unit processes with detailed flow diagrams		X				
8.	Site location map on 7.5' USGS map	(265)(z)(18)(i) (ii)	X			Exhibit G	
9.	General arrangement plan(s) showing facility layout	(265)(z)(18)(i) (ii)	X			Exhibit H	
10.	Topographic map(s) showing within ¼ mile the following:	(265)(z)(21)(i)	X			Drawing #D-1754 (10A thru 10H)	
	A. Public and private water supplies		X				
	B. Wells, springs, swamps and other bodies of water		X				
	C. 100-year floodplain		X				
	D. Geologic and hydrologic features		X				
	E. Gas and oil wells				X	None in this area	
	F. High tension powerline and pipeline right-of-ways		X				
	G. Previously mined areas, adversely affected or anomalous areas		X				
	H. Traffic flows		X				
11.	Map and drawing requirements	(265)(18)(ii)	X				
	A. Maps are 30"x36" or smaller, clear and legible		X				

GENERAL REQUIREMENTS (Continued)

For: Containers Tanks Waste Piles		Thermal Treatment Incinerators Chemical, Physical, or Biological Treatment	Provided	Not Provided	Not Applicable	Facility Name <u>Howmet Aluminum Corp.</u> ID Number <u>PAD049029697</u> Facility Location <u>Lancaster, PA</u>
REQUIREMENTS	SECTION					COMMENTS
11. Map and drawing requirements (continued)						
B. Plans are 1" = 200', with 10' contour intervals			X			Plans 1" = 100', Contours on Exhibit G
C. Sections and elevations have a horizontal scale 1" = 200' and vertical scale 1" = 10'			X		X	Horiz. Scale 1"=100'. No Elevations.
E. Grid is tied to a permanent fixed marker on-site					X	
F. Vertical control tied to a benchmark elevation			X			Plant Floor Elevations are benchmarks
12. Specifications, reports, or narratives that fully detail:	(265)(z)(18)(iii) (265)(z)(21)(iii)				X	
A. Construction and manufacturing design calculations					X	
B. Quality control methods, procedures and tests to be used during construction					X	
C. Specifications of construction information not shown on drawings that will be supplied to Contractor					X	
13. Drawings and/or specifications with details relating to:	(265)(z)(21)(ii)		X			See drawing D-1754
A. Management of surface water					X	
B. Erosion control					X	
C. Revegetation procedures					X	
D. Site preparation					X	
E. Monitoring and measuring devices					X	
F. Location and limits of construction by grid controls			X			Texas Eastern, PennDOT and PP&L right-of-ways and building restriction lines shown on Drawing D-1754.
G. Location, description and purpose of all easements existing on-site and a definition of all title, deed or usage restrictions			X			

GENERAL REQUIREMENTS (Continued)

For: Containers Thermal Treatment
 Tanks Incinerators
 Waste Piles Chemical, Physical, or Biological Treatment

Facility Name Howmet Aluminum Corp.
 ID Number PAD049029697
 Facility Location Lancaster, PA

REQUIREMENTS	SECTION	Provided	Not Provided	Not Applicable	COMMENTS
13. Drawings and/or specifications with details relating to:(continued)					
H. Location of gas, oil and other wells and all utilities on-site		X			3 Existing water wells, city water,
I. Location of public and private water supplies on-site		X			electricity, natural gas, sewer, and nitrogen source, on drawing D-1754.
J. Cross-sections shown on drawings and referenced to the grid system for horizontal location, whenever applicable				X	
K. Grades required for drainage of property				X	
L. Cross-sections of the access roads and all weather roads, identifying construction materials, slopes, grades and/or profiles				X	
M. Cross-sections, grades and/or profiles of surface drainage diversion ditches, capacities and calculations for ditch volume				X	
N. Process and instrumentation diagrams for unit processes to be employed at facility				X	

WASTE CHARACTERISTICS - FOR: ALL FACILITIES

REQUIREMENTS	SECTION	Provided	Not Provided	N/A	COMMENTS
1. For each hazardous waste stored or treated: (264)(c)(1)		X			See Exhibit I
A. A general description of the waste		X			
B. EPA Hazardous waste number					
C. Hazard characteristics		X			
D. Basis for hazard designation		X			
E. Laboratory report detailing the chemical and physical analyses of representative samples					
OR a complete Module 1 for each hazardous waste		X			See Exhibit J
			X	X	
2. A copy of the Waste Analysis Plan	(264)(c)(3)	X			
3. Liner compatability test results (if applicable) for each hazardous waste	(264)(c)(4)			X	

IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES - FOR: ALL FACILITIES

REQUIREMENTS	SECTION				COMMENTS
1. Description of precautions taken to prevent accidental ignition or reaction of wastes, including:	(264)(g)	X			See Exhibit K
A. Provisions to protect waste from sources of ignition or reaction	(264)(g)(1)	X			
B. Special handling procedures for storing, treating, disposing or mixing	(264)(g)(2)	X			
C. Other specific process requirements		X			
i. Containers	(264)(q)(2,7,8,9)	X			
ii. Tanks	(264)(r)(2,3,10,11)			X	
iii. Waste Piles	(264)(t)(20,21,22)	X			
iv. Landfills	(264)(v)(4)(ii,iii)			X	
v. Surface Impoundments	(264)(s)(4)(i,ii,iv,v)			X	
vi. Land Treatment	(264)(u)(3,21)			X	

SECURITY - FOR: ALL FACILITIES

REQUIREMENTS	SECTION	Provided	Not Prov.	N/A	COMMENTS
1. Description of security procedures and equipment	(264)(d)(2)	X			See Exhibit L
A. 24-hour surveillance system or		X			
B. Artificial or approved natural barrier		X			
C. Warning signs		X			
2. In lieu of the above, demonstration that intrusion would not cause injury or violation of RCRA	(264)(d)(1)		X	X	

INSPECTION - FOR: ALL FACILITIES

REQUIREMENTS	SECTION				COMMENTS
1. General inspection schedule for security devices and monitoring, safety, emergency, operating, and structural equipment	(264)(e)(2)	X			
A. Identification of types of problems to be inspected		X			See Exhibit M
B. Frequency of inspections		X			
2. Specific process inspection requirements for:					
A. Containers	(264)(q)(5)			X	
B. Tanks	(264)(r)(8)	X			
C. Waste Piles	(264)(t)(12)			X	
D. Incinerators	(264)(w)(9)(v)			X	
E. Surface Impoundments	(264)(s)(4)(iii)			X	
F. Loading and unloading areas	(264)(e)(3)			X	
3. Description of remedial action procedures	(264)(e)(4)	X			
4. Copy of the inspection log	(264)(e)(5)	X			
5. Construction schedule and description of quality control procedures, tests and inspections	(264)(e)(6)			X	Installed 1973

REQUIREMENTS	SECTION	Provided	Not Provided	Not Applicable	COMMENTS
1. Description of introductory and continuing training programs	(264)(f)(4, 5, 1)	X			See Exhibit N - Since this hazardous waste is characterized, "Ignitable", training is essentially Fire Brigade Training.
2. An outline of the training program which briefly describes:					
A. Job titles and duties of each employee position requiring training	(264)(f)(6)	X			Exhibit O-2
B. Content, frequency, and technique used in both introductory and continuing training for each employee		X			Exhibits N & N-1
C. Training directors qualifications	(264)(f)(2)	X			Exhibits N-2, N-3, N-4
D. Relevance of training to job position	(264)(f)(2)	X			Exhibits N-2, N-3, N-4
E. Training for hazardous waste management	(264)(f)(2)	X			Exhibit N-1
F. Training for contingency plan implementation	(264)(f)(2)	X			Exhibit N-1
G. Training for emergency response, including:	(264)(f)(3)	X			Exhibit N-1
i. Procedures for using, inspecting, repairing and replacing facility monitoring and emergency equipment		X			Exhibit N-1
ii. Key parameters for automatic cutoff systems				X	
iii. Communications or alarm systems		X			Exhibits O-7, O-8, & O-9
iv. Response to fires or explosions		X			Exhibit N-1
v. Response to ground water contamination incidents				X	
vi. Shutdown of operations		X			Exhibit O-11
3. Provisions for implementing the training program		X			Exhibit N
4. Sample personnel training record form	(264)(f)(7)	X			Exhibit N-5

PREPAREDNESS, PREVENTION AND CONTINGENCY PLAN (PPC) - FOR: ALL FACILITIES

REQUIREMENTS	SECTION	Provided	Not Provided	N/A	COMMENTS
1. A copy of the PPC plan addressing the following:	(264)(i) and "Guidelines for Development and Implementation of PPC Plans"	X			See Exhibit - 0
A. General description of the industrial or commercial activity		X			See Exhibit - 0 - 1
B. Organizational structure for implementation of the PPC Plan		X			See Exhibit - 0 - 2
C. Material and waste inventory		X			See Exhibit - 0 - 3
D. Plant operations		X			See Exhibit - 0 - 1
E. Material compatibility				X	Incompatible materials not present
F. Inspection and monitoring program		X			See Exhibit M & 0-4
G. Preventive maintenance		X			See Exhibit 0-5
H. Housekeeping program		X			See Exhibit 0-6
I. Security		X			See Exhibit L
J. External factors		X			See Exhibit 0-7
K. Internal and external communications		X			See Exhibit 0-8 & 0-9
L. Employee training program		X			See Exhibit N
M. List of emergency coordinators		X			See Exhibit 0-10
N. Duties and responsibilities of the emergency coordinator		X			See Exhibit 0-11
O. Chain of command		X			See Exhibit 0-12
P. List of agencies to be notified		X			See Exhibit 0-13
Q. Emergency equipment		X			See Exhibit 0-14
R. Evacuation plan for installation personnel		X			See Exhibit 0-15
S. Arrangements with emergency response contractors		X			See Exhibit 0-16
T. Agreements with state and local emergency response teams and hospitals		X			See Exhibit 0-9
U. Pollution incident history		X			See Module 10 - Item C-4
V. Implementation schedule		X			PPC Plan currently in effect
W. Amendments as required by process				X	

CLOSURE - FOR: ALL FACILITIES

REQUIREMENTS	SECTION	Provided	Not Provided	N/A	COMMENTS
1. A copy of the closure plan, including:	(264)(o)(3)	X			See Exhibit P
A. If applicable, a description of partial closure including partial closure activities	(264)(o)(3)(i)			X	
B. A description of final closure activities and how these will be conducted according to the regulations	(264)(o)(3)(i)	X			See Exhibit P
C. A description of the maximum waste inventory in storage and treatment at any time during the life of the facility	(264)(o)(3)(ii)	X			Max. Storage 10,000 Gal. No Treatment
D. A description of how closure minimizes the need for post-closure maintenance and minimizes the release of wastes	(264)(o)(2)	X			See "Postclosure", page 10 of 12.
E. An estimate of the schedule for final closure, including the expected year of closure and the total time required for closure activities	(264)(o)(3)(iv)	X			Closure estimated 2010. Closure time - 1 month.
F. A description of procedures for the disposal or decontamination of equipment	(264)(o)(3)(iii)	X			See Exhibit P
G. Specific closure procedures as required by subsection	(264)(o)(3)(i)	X			See Exhibit P
i. Containers	(264)(q)(13)			X	
ii. Tank	(264)(r)(40)			X	Tank will be used for other purposes.
iii. Waste Piles	(264)(t)(42,43)			X	
iv. Incinerators	(264)(w)(10)			X	
v. Landfills	(264)(v)(3)(xxvi)			X	
vi. Surface impoundments	(264)(s)(3)(xxx,xxxi)			X	
vii. Land treatment	(264)(u)(17,18,19,20)			X	

POSTCLOSURE

For: All disposal facilities, except incinerators

REQUIREMENTS	SECTION	Provided	Not Provided	Not Applicable	COMMENTS
1. A copy of the postclosure plan identifying activities to be conducted after closure and their frequency, including:	(264)(o)(16)	—	—	X	After closure cleanup, no
A. Groundwater monitoring and reporting program	(264)(o)(16)(i)	—	—	X	hazardous material will exist;
B. Planned maintenance activities	(264)(o)(16)(ii)	—	—	X	
C. Name, address and phone number of person or office for contact after closure	(264)(o)(16)(iii)	—	—	X	Tank and equipment will be used for other purposes.

FINANCIAL ASSURANCE - FOR: ALL FACILITIES

REQUIREMENTS	SECTION	Provided	Not Provided	Not Applicable	COMMENTS
1. Closure and postclosure for all disposal facilities, except incinerators	(264)(p)	X	—	—	\$10,000 available at all times.
2. Liability insurance	(264)(p)	X	—	—	See Exhibit Q

TANKS

REQUIREMENTS	SECTION	Provided	Not Provided	N/A	COMMENTS
1. Tank dimensions, capacity, shell thickness and strength	(264)(r)(15)	X			10'-0" Diam. X 17'-0" Long X 1/4" Shell Th. Capacity 10,000 Gal. Mild Steel
2. References to design standards or other information used in tank design	(264)(r)(15)	X			Standard Commercial Tank
3. Description of design specifications, including identification of construction and lining materials for assessment of corrosion and erosion potential	(264)(r)(3,15)			X	Material - Mild Steel. No Lining.
4. Diagram of piping, instrumentation, and process flow	(264)(r)(15)	X			See drawing D-1754. No instrumentation
5. Description of feed systems, safety cut-off, by-pass systems, pressure controls, and alarm systems	(264)(r)(5,16)			X	Fed by air-driven pump.
6. For above ground and partially above ground tanks, containment structure design information	(264)(r)(6)	X			Containment Walls and Bottom - 12" reinforced concrete.
7. Uncovered tanks: freeboard or overflow alarm/system	(264)(r)(4)			X	
8. Special procedures for treating, storing, and handling potentially incompatible wastes	(264)(r)(2,7,12,13)			X	
9. Special procedures for treating, storing, and handling ignitable waste and reactive wastes	(264)(g)(2) (264)(r)(10,11)	X X			In compliance In compliance
10. Run-off collection and management system, including supporting calculations	(264)(r)(29)			X	Containment prevents runoff.
11. Measures to prevent run-on	(264)(r)(30)			X	Top of containment 18" above ground level.

TANKS (Continued)

REQUIREMENTS	SECTION	Provided	Not Provided	N/A	COMMENTS
12. Surface water management system	(264)(r)(28)	—	—	X	Containment inspected &/or pumped monthly.
13. Vector, Odor and Noise Control (VONC) Plan	(264)(r)(34)	—	—	X	
14. Provision of 50' buffer zone between hazardous waste facility and property line	(264)(r)(27)	X	—	—	186 ft. See drawing D-1754.
15. Inspection procedures for assessing tank condition; capable of detecting cracks, leaks, corrosion, erosion or wall thinning	(264)(r)(8,14)	X	—	—	See Exhibit M.
16. TER Plan	(264)(r)(23)	—	—	X	Tank contents non-corrosive.
17. Access road dimensions and construction description	(264)(r)(26)	X	—	—	See drawing D-1754.
18. List of equipment and standby equipment used in operation of the facility	(264)(r)(35,36)	X	—	—	Agitator, Heaters. No standbys.
19. Description of unloading areas	(264)(r)(37)	X	—	—	Macadamized in-plant roads.
20. Measures to control dust and waste tracking	(264)(r)(38,39)	—	—	X	
21. For facilities receiving wastes from off-site, a description of the weighing or measuring facilities	(264)(r)(17)	—	—	X	
22. Special closure requirements	(264)(r)(9,40)	—	—	X	

PART B - HAZARDOUS WASTE TSD APPLICATION

General Requirements

Item 5 - Certification

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

John C. Kirchner
(Signature)

Name: John C. Kirchner

Title: Vice Pres. & Gen. Mgr.

Sworn to and subscribed before me this

23rd day of February,

19 83.

Catherine B. Marzolf
Notary Public

CATHERINE D. MARZOLF, NOTARY PUBLIC
MANHEIM TWP., LANCASTER COUNTY
MY COMMISSION EXPIRES SEPT. 22, 1986
Member, Pennsylvania Association of Notaries



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF SOLID WASTE MANAGEMENT

DATE PREPARED 28 January 1983

IDENTIFICATION NO. PAD049029697

COMPLIANCE HISTORY

MODULE NO. 10

COMPLETION OF THIS MODULE IS REQUIRED AS A PART
OF THE APPLICATION FOR ANY TYPE OF SOLID WASTE
MANAGEMENT PERMIT OR LICENSE

ATTACH ADDITIONAL SHEETS AS NECESSARY TO ANSWER THE FOLLOWING:

A. Purpose and Applicability:

1. The purpose of this application module is to assess the applicant's history of compliance with laws, regulations and standards relating to environmental protection in conformance with Sections 503(c) and (d) of the Pennsylvania Solid Waste Management Act. Failure to provide valid information required may result in the denial, suspension or revocation of your permit [license] as well as the imposition of civil and criminal sanctions.
2. Completion of this module is required in order for the Department to process and review the application and/or permit [license] pursuant to the Solid Waste Management Act.
3. This module may also be required as part of a facility [transporter's] annual report, when a permit is to be amended, revised or otherwise modified, or when the Department determines such information is necessary to properly monitor a permit [license].
4. Unless otherwise noted herein, this module applies to compliance history in regard to the following statutes and regulations thereunder.
 - a. Pennsylvania Solid Waste Management Act of July 7, 1980.
 - b. Clean Streams Law of June 22, 1937, (P.L. 1987, No. 394).
 - c. The Air Pollution Control Act of January 8, 1960 (1959 P.L. 2119, No. 787).
 - d. The Dam Safety and Encroachments Act of November 26, 1978 (P.L. 1375, No. 325).
 - e. The Surface Mining Conservation and Reclamation Act of May 31, 1945 (P.L. 1198, No. 418).
 - f. Other Pennsylvania State statutes relating to environmental protection, public health, safety or welfare.

- g. Any Federal statute relating to environmental protection, public health, public safety or welfare, as applied to a Pennsylvania location, facility or activity.
5. If the Applicant is a corporation, this module shall be signed by two corporate officers authorized to execute this module, and a corporate seal shall be affixed.

B. Applicant Background:

The following questions are to be completed by the applicant:

1. State the legal name and address of the applicant.

Howmet Aluminum Corporation
Mill Products Division
1480 Manheim Pike

2. Identify all of the applicant's places of business and terminals where municipal or residual waste processing or disposal or hazardous waste generation, transportation, storage, treatment or disposal facilities or activities are conducted, both in Pennsylvania and outside of Pennsylvania.

Lancaster, PA 17604
Same as Item #1.

3. Identify the form of management under which the applicant conducts its business in Pennsylvania (check appropriate box):

<input type="checkbox"/> Individual	<input type="checkbox"/> Partnership
<input type="checkbox"/> Municipality	<input type="checkbox"/> Limited Partnership
<input type="checkbox"/> Proprietorship	<input type="checkbox"/> Government Agency
<input checked="" type="checkbox"/> Corporation	<input type="checkbox"/> Other (identify the nature of the business relationship)

4. Complete the following where applicable:

- a. If the applicant is a corporation (as indicated in Question B.3 above), list names and address of all principals of the corporation. This

shall include the following: corporate officers, members of the board of directors, and principal stockholders who own, hold, or control stock of five percent (5%) or more of a publicly held corporation or ten percent (10%) or more of a privately held corporation. List the social security number* of all individuals identified, and the IRS tax identification number and/or employer identification number of corporations and other business entities.

Exhibit A - List of Corporate Officers - Attached

Exhibit B - List of Members of Board of Directors - Attached

There are no stockholders. Howmet Aluminum Corporation (HAC) is a subsidiary of Pechiney Ugine Kuhlmann Corporation which is wholly owned (nationalized) by the French government.

HAC Federal I.D. No. 13-2838698

HAC Penna. I.D. No. 99-18329

- b. List and designate the relationship of all parent corporations, including ultimate parent corporations, and all subsidiary corporations of the ultimate parent corporation and their principal places of business. Include the IRS tax identification number of the corporations listed.

Ultimate parent: French Government - No IRS number.

Parent: Pechiney Ugine Kuhlmann Corporation - IRS #13-2672498

Subsidiaries: Howmet Aluminum Corp. - IRS #13-2838698

Howmet Turbine Components Corp. - IRS #13-2838093

- c. If the applicant is a partnership (as indicated in Question B.2 above), list the names, social security numbers and addresses of all partners, both general and limited.

N/A

*Supplying individual social security numbers is optional; failure to provide all applicable numbers, however, will make processing of the application more difficult.

- d. List the name, social security number, or IRS tax identification number and/or employer ID number and affiliation of any other person or organization having an interest in the proposed facility or activity including business associates, contractors, subcontractors, agents, and landowners.

N/A

5. List all DER permits or licenses that the applicant, including all persons and organizations identified in this Section B, currently has in effect or has had in effect in the past. (Include type of permit or license, number and location, date issued, and expiration date, if any.)

Exhibit C - List of 14 Permits

6. Identify any municipal or residual waste processing or disposal or hazardous waste storage, treatment, transportation, or disposal facility, area, or activity in Pennsylvania which the applicant, or any person or organization identified in response to Section B, currently owns or operates, or previously owned or operated, but which are not listed under any of the above responses to this Module. This shall include any solid waste management activities which are no longer permitted or which were never under permit. Identify on a separate list

solid waste facilities outside of Pennsylvania. Include the location(s) of all such facilities, areas, or activities, the type of operation, and description of facility, and identify any state or federal permits pursuant to which they operate or have operated.

Abandoned limestone quarry at west end of Howmet property - Lancaster, PA. Formerly used as a disposal dump for in-plant residual waste. Discontinued in March 1970. Closed with earth-fill December 1971. Approximately 9,000 cubic yards residual waste excavated and disposed off-site during new construction January 1980.

C. Compliance Background:

1. Identify any "notice of violation" sent to the applicant or those entities identified anywhere in response to Section B over the past five year period from DER. Include the date of the "notice", the location of the alleged violation, the nature of the alleged violation and the disposition. (Attach copies).

Exhibit D - "Notice of Violation" dated 21 Oct. 82 - Lancaster, PA

RCRA - lack of inspection schedule and personnel training records.

Exhibit E - Response dated 25 Oct. 82 - Violations corrected.

2. Identify any administrative orders issued by DER, civil penalties assessed by DER, bond forfeiture actions brought by DER, and civil penalties actions adjudicated by the Environmental Hearing Board since January 1, 1970, against the applicant or those entities identified in response to Section B. Describe the date, location of the violations, and nature of the violations. (Attach copies of orders, assessments and adjudications).

None

3. Identify any summary, misdemeanor, or felony convictions that have been obtained against the applicant or those persons or entities identified in response to Section B pursuant to those statutes identified in Section A.4, or for any acts in Pennsylvania involving the storage, treatment, transportation, processing, or disposal of solid wastes.

None

4. Identify any court proceedings in Pennsylvania since January 1, 1970 which relate to those statutes listed in Section A.4 that those entities identified in response to Section B have been a party to. State the disposition of those proceedings. Do not include those proceedings listed in Section C.3 above.

Criminal Complaint #1975-CR-329 issued 16 June 1975 on behalf of DER, for an alleged 60% opacity violation from Howmet's #3 melting furnace on 14 May 1975.

Disposition: Hearing held 14 July 1975. Case put into continuance, then abandoned. #3 melter has since been removed and no longer exists.

5. Identify any consent order, consent adjudication, consent decree or settlement agreement entered into by the applicant, or those entities identified in Section B, to which either a county health department, the DER, or the U.S. Environmental Protection Agency was a party and which concerned any facility or activity in Pennsylvania regarding an environmental protection statute, or ordinance regarding the public health, safety or welfare.

None

6. For all facilities and activities identified in response to Question B.6 above, indicate whether such facility or activity was the subject of an administrative order, consent agreement, consent adjudication, consent order, settlement agreement, court order, consent decree, civil penalties bond forfeiture proceedings, consent decree, conviction, or permit or license suspension or revocation pursuant to the statutes listed in Section A. If any of these facilities or activities were subject to any of the actions identified herein, include the date of the action, the location of the violation, the nature of the violation, and disposition. (Attach copies).

None

7. Compliance Outside of Pennsylvania

- a. Identify any criminal convictions pursuant to violations of any state or federal statutes for activities outside of Pennsylvania relating to environmental protection or to the protection of the public health, safety and welfare at facilities or due to activities under the control of those entities listed in response to Section B within the past five years. Include convictions for any acts involving the storage, treatment, transportation, processing or disposal of solid waste. (Describe the date of the convictions and offenses, the location of the offenses, and the nature of the offenses.)

None

- b. Identify any final administrative orders issued within the past five years pursuant to any state or federal statutes for activities outside of Pennsylvania relating to environmental protection or to the protection of the public health, safety and welfare to those entities identified in response to Section B. (Describe the date of the order(s), the location of the violation(s), the nature of the violation(s).) (Attach copies).

None

- c. Identify any court order, court decree, consent decree, consent adjudication, consent order, final civil penalty adjudication, final action on bond forfeiture, or settlement agreement in the past five years between those entities identified in response to Section B and any state or federal agencies responsible for environmental protection or the protection of the public health, safety and welfare. (Describe the date of the order, decree, etc., the location of the violation(s), the nature of the violation(s).) (Attach copies).

None

I(we) hereby certify that I(we) have the authority to respond to the above questions on behalf of the applicant, and that the information provided herein is true and correct to the best of my(our) knowledge, information and belief.

John C. Kirchner
(signature)

Name: John C. Kirchner

Title: Vice Pres. & Gen. Mgr.

Social Security No.: 201-24-2585

Sworn to and subscribed before me this

23rd day of February,
19 83.

Catherine B. Marzolf
Notary Public

CATHERINE B. MARZOLF, NOTARY PUBLIC
MANHEIM TWP., LANCASTER COUNTY
MY COMMISSION EXPIRES SEPT. 22, 1986
Member, Pennsylvania Association of Notaries

Guy C. Lanza
(signature)

Name: Guy C. Lanza

Title: Gen. Mgr. of Manufacturing

Social Security No.: 198-14-5134

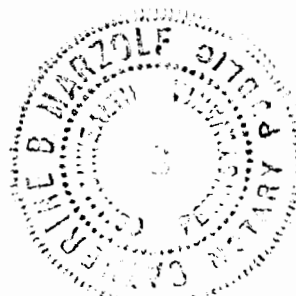
Sworn to and subscribed before me this

23rd day of February,
19 83.

Catherine B. Marzolf
Notary Public

For Corporations; Affix Corporate Seal:
(CORPORATE SEAL NOT AVAILABLE)

(For Corporations, at least two corporate officers must sign above.)



CATHERINE B. MARZOLF, NOTARY PUBLIC
MANHEIM TWP., LANCASTER COUNTY
MY COMMISSION EXPIRES SEPT. 22, 1986
Member, Pennsylvania Association of Notaries

EXHIBIT A

Module 10 - Section B - Item 4A

Officers

HOWMET ALUMINUM CORPORATION

MICHEL J. GUDEFIN
Chairman

WILLIAM R. HAMPSHIRE
President and Chief Executive Officer

ERIC BARRILLON
Group Vice President
Aluminum Reduction

JOHN J. CAMERON
Group Vice President
Fabricated Products

LARRY B. FROST
Planning and Development

R. DWAIN NUNN
Vice President-Central Metal Control

ROBERT L. PFANN
Vice President-Human Resources

DANIEL J. BURCHSTEAD
Vice President-Finance and Controller

HENRY V. KENSING
Secretary

ALAIN BOMMELAER
Assistant Treasurer

MANUEL A. BERNARDO
Assistant Secretary

EXHIBIT B

Module 10 - Section B - Item 4A

Board of Directors

HOWMET ALUMINUM CORPORATION

CHAIRMAN

MICHEL J. GUDEFIN
President
Pechiney Ugine Kuhlmann Corporation
475 Steamboat Road
Greenwich, CT 06836-1960
Telephone: (203) 661-4600

BOARD OF DIRECTORS

GEORGES-YVES KERVERN
Vice President
Aluminum
Pechiney Ugine Kuhlmann
23 rue Balzac, 75008 Paris
France
Telephone: (01.33.1) 561.61.61

DIRECTORS

ERIC BARRILLON
Group Vice-President
Howmet Aluminum Corporation
475 Steamboat Road, P.O. Box 1960
Greenwich, CT 06836-1960
Telephone: (203) 661-4600

ROBERT H. KNIGHT
Partner
Shearman & Sterling
53 Wall Street
New York, N.Y. 10005
Telephone: (212) 483-1000

JOHN J. CAMERON
Group Vice President
Fabricated Products
Howmet Aluminum Corporation
475 Steamboat Road, P.O. Box 1960
Greenwich, CT 06836-1960
Telephone: (203) 661-4600

AYMAR de LASTOURS
PUK Group Delegate
Aluminium Pechiney Australia Pty.
151 Macquarie St., G.P.O. Box 4473
Sydney-2001, Australia
Telephone: 19 (612) 27.9469

JACQUES DESAZARS de MONTGAILHARD
President
Pechiney Ugine Kuhlmann
23 rue Balzac, 75008 Paris, France
Telephone: (01.33.1) 561.61.61

XAVIER NOSTEN
Special Assistant fo the
Pres. of Pechiney
Pechiney Ugine Kuhlmann
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France
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WILLIAM R. HAMPSHIRE
President & Chief Executive Officer
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475 Steamboat Road, P.O. Box 1960
Greenwich, CT 06836-1960
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MAURICE M. SERPETTE
Vice President-Intenational Affairs
Pechiney Ugine Kuhlmann
23 rue Balzac, 75008 Paris France
Telephone: (01.33.1) 561.61.61

EXHIBIT C

MODULE 10 - SECTION B - ITEM 5

<u>*</u>	<u>TYPE PERMIT</u>	<u>PERMIT NO.</u>	<u>SOURCE</u>	<u>DATE ISSUED</u>	<u>EXPIRE DATE</u>	<u>REMARKS</u>
1	NPDES	PA0012912	Lagoon Discharge	31 Oct. 80	31 Oct. 85	
2	RCRA	PAD049029697	Hazardous Waste	20 Oct. 80	-----	
3	Air	36-301-072	Liquid Waste Incineration	1 Sept. 77	1 Sept. 78	Inactive
4	Air	36-308-007	66"-3 Stand Hot Mill	1 Sept. 81	1 Sept. 83	
5	Air	36-308-008	#7 and #8 Slab Furnaces	1 Sept. 81	31 Aug. 83	
6	Air	36-308-010	#3 and #4 Holding Furnaces	1 Sept. 81	31 March 82	Inactive
7	Air	36-308-011	3 Annealing Furnaces	1 Sept. 81	31 Aug. 83	
8	Air	36-308-012	#3 Slab Furnace	1 Sept. 81	31 Aug. 83	
9	Air	36-308-047A	#2 and #3 Casting System	18 Nov. 82	31 July 87	
10	Air	36-308-050	80" Reversing Hot Mill	1 Sept. 82	31 Aug. 87	
11	Air	36-308-051	#9 and #10 Slab Furnaces	1 Sept. 82	31 Aug. 87	
12	Air	36-308-057	#10 and #11 Melter Furnaces	24 Sept. 81	31 Aug. 86	
13	Air	36-308-058	Dross Reclamation	3 Sept. 81	31 Aug. 86	
14	Air	36-318-004	Paint Ovens	1 Sept. 81	31 Aug. 83	



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

Bureau of Solid Waste Management
407 South Cameron Street
Harrisburg, Pennsylvania 17101
(717) 787-9697
October 21, 1982

NOTICE OF VIOLATION

Certified Mail No. 113364

Mr. Guy Lanza, Plant Manager
Howmet Aluminum Corporation
Mill Product Division
1480 Manheim Pike
Lancaster, PA 17604

Re: Hazardous Waste Inspection
ID #PAD049029697
Manheim Township
Lancaster County

Dear Mr. Lanza:

As a result of the hazardous waste inspection conducted at your facility on September 14, 1982, the Department has determined that Howmet Aluminum Corporation is in violation of Act 97, the Solid Waste Management Act of the Commonwealth of Pennsylvania, Section 610(4) and Chapter 75, the Solid Waste Management Rules and Regulations as follows:

1. An inspection schedule, as required by Section 75.256(e)(2), for the tank used to store waste solvents was not available for review at the time of the inspection. This schedule and results of inspections must be maintained within the facility written operating record as required by Chapter 75.265(k)(2)(v).
2. Personnel training records as required by Chapter 75.265(f)(6)(7) were not available for review at the time of the inspection. These records must be maintained at the facility.

Mr. Guy Lanza

-2-

October 21, 1982

These records if not currently maintained should be initiated immediately. Please notify this office in writing if such records are being maintained or have been initiated and are available for review during inspection.

Compliance with the provisions of this notice should not be construed as to grant immunity from prosecution for any violation of the statutes of the Commonwealth of Pennsylvania.

If you have any questions concerning this matter, please feel free to contact this office.

Sincerely,



Arthur L. Dalla Piazza
Solid Waste Specialist
Harrisburg Regional Office

ALDP:flw

cc: J. F. Fisher, Environmental Engineer, Howmet Aluminum Corporation



HOWMET ALUMINUM CORPORATION
MILL PRODUCTS DIVISION

Box 3167, Lancaster, Pennsylvania 17604 (717) 393-9641 Telex: 84-8436

October 25, 1982

Mr. Arthur Dalla Piazza, Solid Waste Specialist
Bureau of Solid Waste Management
407 South Cameron St.
Harrisburg, Pa. 17101

Subject: 14 Sept. 82 Hazardous Waste Inspection--
ID #PAD049029697.

Dear Mr. Piazza:

This is in response to your letter of 21 Oct. 82 concerning subject.

Please be advised that these documents and records have been assembled and are currently maintained in our facility for inspection at your convenience.

Very truly yours,

HOWMET ALUMINUM CORPORATION

A handwritten signature in dark ink, appearing to read "J. F. Fischer".

J. F. Fischer
Environmental Engineer

JFF/ld

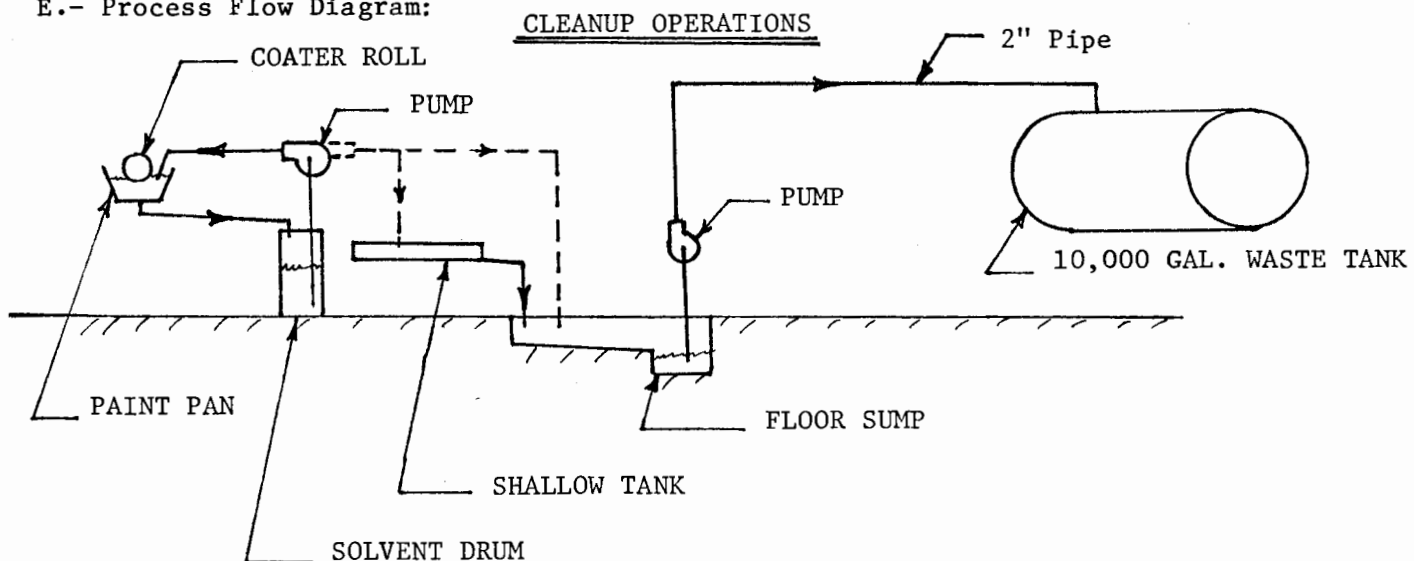
cc: G. Lanza
R. Beck
B. Rupp
S. Kirchner

EXHIBIT F

General Information - General Requirements - Item 7 - Section (265)(Z)(18)(i)

- A.- This is a storage facility for ignitable waste paint/cleanup solvent liquid, in a coil coating line for aluminum strip.
- B.- The storage facility consists of a 10,000 gallon steel tank 10 ft. diameter, 17 ft. long, 1/4" wall, with manhole access, electric agitator, inlet and outlet piping and valving, mechanical (float) depth gauge, electric internal heaters, flame arrestor vent. Tank is supported on 2 - 18" thick reinforced concrete saddles inside of a reinforced concrete containment with 12" walls and bottom. Net containment capacity is 10,050 gallons.
- C.- Daily operations: This is a roll-coating process. Paint is circulated via air pump from paint drum to paint pan in which roll is running. Excess paint drains back to paint drum. Paint color and/or type is changed on the average of 5 times/day of 2 shifts. At each change, the pan, pump, and rolls are cleaned (after draining pan back to paint drum) by circulating solvent - Exxon Solvesso - from a separate partially-filled drum using the same air pump. Doctor blades and baffles are cleaned separately in a shallow tank. The spent solvent/paint waste totals 30 gallons/day and is dumped into a covered concrete floor sump of 478 gallon capacity. Once per day the contents of this sump are pumped to the 10,000 gallon waste storage tank.
- D.- Waste types: Acrylic based paint, polyester based paint, and solvents - Solvesso, MEK, Toluene, Xylene, Methyl isobutyl ketone.
Sources: Cleanup operations on paint rolls, pans, pump, doctor blades, and baffles.
Volume: 30 gallons/day, 7000 to 8000 gal./year.

E.- Process Flow Diagram:



J.F.F. - 8 Feb. 83

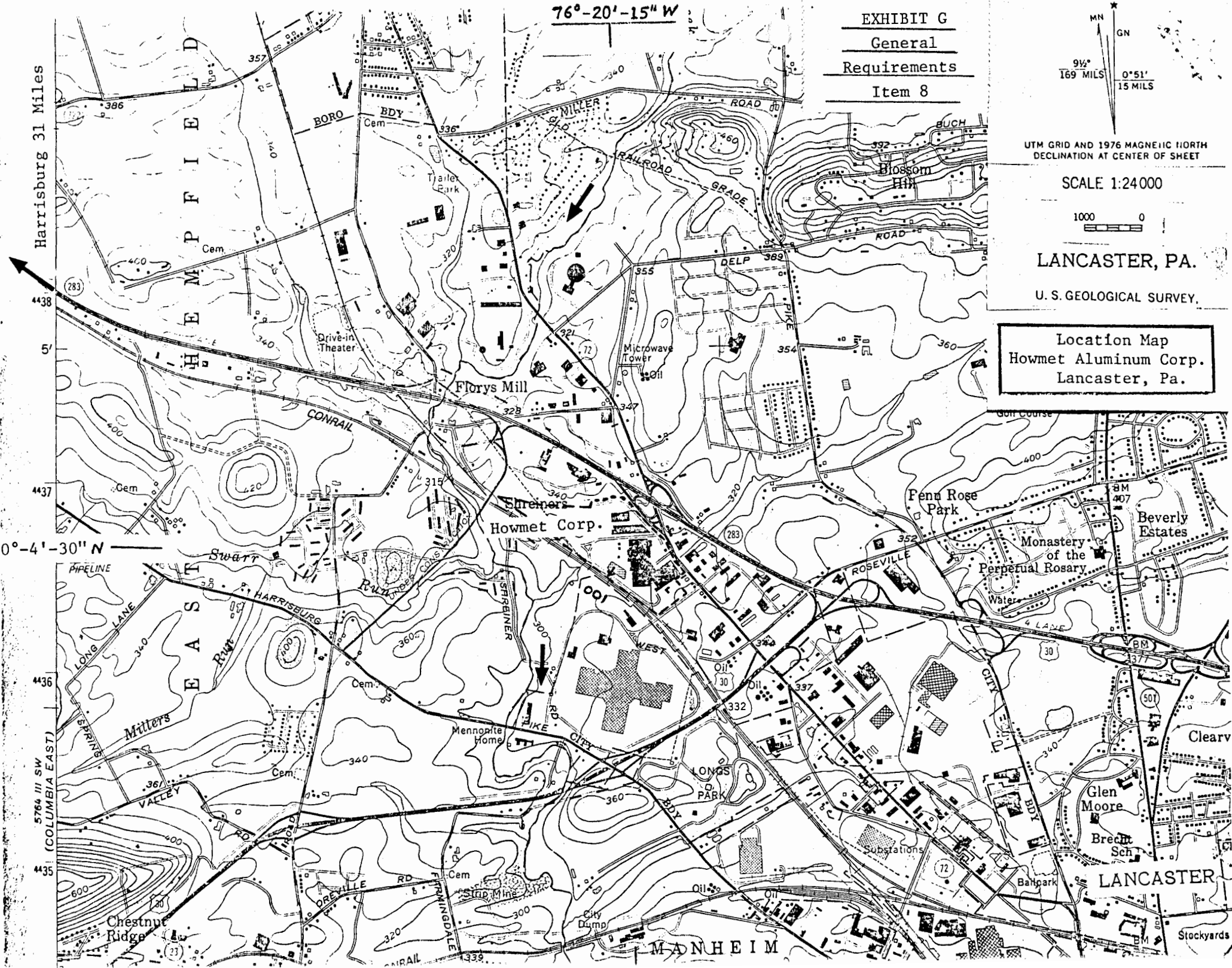
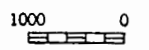


EXHIBIT G
General
Requirements
Item 8

MN GN
9 1/2' 169 MILS 0° 51' 15 MILS
UTM GRID AND 1976 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

SCALE 1:24000



LANCASTER, PA.

U. S. GEOLOGICAL SURVEY.

Location Map
Howmet Aluminum Corp.
Lancaster, Pa.

EXHIBIT I

Waste Characteristics - Page 5 of 12

Item 1 - Sec. (264) (c) (1)

- A. General description: This is a mixture of waste paint and solvent, in liquid form, generated from cleanup operations in a coil coating line for aluminum strip.
- B. EPA Hazardous Waste Numbers: F003, F005.
- C. Ignitable (I), toxic (T).
- D. Hazardous waste from non-specific sources:
 - F003 - Xylene, methyl isobutyl ketone - (I).
 - F005 - Toluene, methyl ethyl ketone - (I), (T).
- E. Laboratory Report: See Exhibit J - Lancaster Labs Report on Sample No. IC-130499.

Item 2 - Sec. (264) (C) (3) - Waste Analysis Plan

- A. Parameters to be analyzed will be the same as listed in Exhibit J. This will properly characterize the hazardous features of this waste.
- B. Testing will be by standard methods.
- C. Sampling will be done while the tank contents are continuously agitated with the built-in electric mixer, and will be done during a drawoff by the disposer or reclaimer. The sample will be taken at the approximate midpoint of time between start and stop of drawdown.
- D. Sampling frequency - once/year.

J.F.F. February 16, 1983

LABORATORY ANALYSIS REPORT



LLI Sample No IC 130499

Date Reported 3/13/81

Date Submitted 2/16/81

P. O. No. P.O. 02554

Howmet Aluminum Corporation

Paint/solvent waste
Sampled by client

ANALYSIS	AS RECEIVED		LAB CODE
Arsenic	1.18	ppm	145-13-02800
Beryllium	< 1.	ppm	147-54-01200
Chromium	0.120	% by wt.	151-53-01000
Cobalt	0.3	ppm	152-40-01000
Copper	402.	ppm	153-53-01000
Lead	581.	ppm	155-13-01000
Mercury	< 0.05	ppm	159-40-02800
Selenium (high level)	24.	ppm	163-44-02500
Zinc	0.123	% by wt.	172-53-01000
Total Solids	173000.	mg/l	203-23-00800
Total Suspended Solids	172000.	mg/l	206-24-00900
Total Dissolved Solids NC	256.	mg/l	209-24-00000
% Ash @ 600 C	8.581	%	999-33-08700
BTU/lb.	13213.	BTU/lb	999-33-00000
Viscosity	30.4	SSU 100 F	999-33-00000
Specific Gravity	0.9094	60 F	999-33-00000
Flash Point closed cup	+12.	F closed	999-33-00000
Chlorine % w/w	0.15	%	999-33-00000
Sulfur % w/w	< 0.05	%	999-33-00000

Additional data generated during requested analysis:

Degrees API @60 F: 24.1

BTU/gal: 100062.

2 COPIES TO Howmet Corporation

Attn: Joe Fischer

INV TO- Howmet Aluminum Corporati 247.00 121 Respectfully submitted
Lancaster Laboratories, Inc.



MAIN LABORATORY:
2425 New Holland Pike, Lancaster, Pa. 17601 • (717) 656-2301

FRANKLIN DIVISION:
P.O. Box 467, 3 Barnett Ave., Waynesboro, Pa. 17268 • (717) 762-9127

Barbara J. Felty
Barbara J. Felty B.S., Mgr.
Air Quality/Industrial Chem.

EXHIBIT K

Ignitable Wastes - Page 5 of 12

Item 1 - Sec (264) (g)

- A. Ignition protection - "Danger - No Smoking" and "Danger - Unauthorized Personnel Keep Out," signs posted at both ends of tank. Ground clamp and sign, "Safety First - Attach Grounding Clamp to Truck Before Attaching Fill Hose to Tank," at unloading end of tank. See enclosed polaroid photo.
- B. Special handling - Air driven pump to transfer waste from production area to tank.

Tank agitator has explosion-proof electric motor.
All electrics in production coating, mixing, and storage area are explosion-proof.
- C. Tank and containment constructed, installed and equipped in accordance with NFPA 30-1981, "Flammable and Combustible Liquids Code."

J.F.F. February 17, 1983



EXHIBIT L

Security - Page 6 of 12

Item (264) (d) (2)

- A. Guard force on duty 24 hours, 7 days. Main guard house contains 8 TV monitors which cover all gates, parking lots, and entry roads.
Guard patrols: Daily - 6 keyrounds, 5 fire valve rounds.
Weekend & Holidays - 8 keyrounds, 6 fire valve rounds.
- B. Entire property is surrounded by 8 ft. chain-link fence.
- C. Warning Signs - See Exhibit K - Item 1-A, and polaroid photo.

J.F.F. 18 Feb. '83

EXHIBIT M

INSPECTION RECORD

PAINT LINE WASTE TANK

DER Title 25, Chapter 75, Section 265 (k) (2) (V)

Date _____

Time _____

Inspector _____

No.	Item	Possible Problem	OK ✓	Date & Nature Of Repair or Remedy
1.	Tank Structural Integrity	Leaks		
2.	Valves & Piping	Leaks		
3.	Containment & Piers	Cracks		
4.	Rainwater in Containment	Above 3"		
5.	Tank Overflow	Fire		
6.	Liquid Level Indicator	Stuck		
7.	Warning Signs	Missing		
8.	Flame Arrestor	Clogged		

Frequency of Inspection - Weekly.



COMMUNICATIONS

July 6, 1981

EMERGENCY ACTION TEAM

ORGANIZATIONAL STATEMENT

THE BASIC OBJECTIVE OF HOWMET MILL PRODUCTS DIVISION'S EMERGENCY ACTION TEAM IS TO PREVENT PERSONAL INJURY AND LOSS OF LIFE AND PROPERTY DUE TO UNWANTED THREATS SUCH AS NATURAL OR MANMADE DISASTER, FIRE, EXPLOSION, OR OTHER EMERGENCY SITUATION. THIS EFFORT WILL BE SUPPORTED BY THE MANAGEMENT ORGANIZATION THROUGH THE MANAGEMENT EMERGENCY COMMITTEE, WHICH IS A RESOURCE STAFF WITH SPECIFIC AREAS OF ACCOUNTABILITY.

THE EMERGENCY ACTION TEAM, A STRUCTURAL FIRE-FIGHTING GROUP, IS UNDER THE AUTHORITY OF THE MANUFACTURING MANAGER AND IS LED BY THREE KEY POSITIONS: FIRST AID CHIEF, FIRE CHIEF, AND EVACUATION CHIEF. THE POSITIONS ARE FILLED BY THE SUPERVISOR OF INDUSTRIAL NURSING, MAIN PLANT GENERAL MAINTENANCE FOREMAN, AND HOT MILL GENERAL MAINTENANCE FOREMAN RESPECTIVELY. ORGANIZATIONAL SUPERVISION ABOVE THESE POSITIONS IS DELEGATED TO THE GENERAL MAINTENANCE SUPERINTENDENT AS EMERGENCY ACTION TEAM ASSISTANT DIRECTOR AND THE SAFETY DIRECTOR OR EMERGENCY ACTION TEAM DIRECTOR.

TRAINING IS PROVIDED FOR ALL EMERGENCY ACTION TEAM MEMBERS COMMENSURATE WITH THOSE DUTIES THAT THE MEMBERS ARE EXPECTED TO PERFORM. A MONTHLY SCHEDULED PROGRAM OF HANDS-ON TRAINING AND/OR EDUCATIONAL INSTRUCTION IS PROVIDED TO INSURE THAT ALL MEMBERS WILL BE EXPOSED TO AT LEAST ONE SESSION QUARTERLY.

THE DUTIES OF THE EMERGENCY ACTION TEAM ARE AS FOLLOWS: ATTEND TRAINING SESSIONS PROVIDED; BE PHYSICALLY CAPABLE OF PERFORMING DUTIES ASSIGNED DURING EMERGENCIES; BE FAMILIAR WITH EXITS AND ESCAPE ROUTES AND EMERGENCY ACTION PRE-PLANS; PERFORM EMERGENCY RESCUE AND INTERIOR STRUCTURAL FIRE FIGHTING; BE FAMILIAR WITH THE LOCATION AND THE OPERATION OF EXTINGUISHERS, STANDPIPES, HOSE LINES, FOAM AGENTS AND OTHER SPECIALIZED FIREFIGHTING EQUIPMENT; BE FAMILIAR WITH SPECIAL HAZARDS IN THE PLANT; AND BE AWARE OF FIRST-AID PROCEDURES FOR DEALING WITH SPECIAL HAZARDS TO WHICH THEY MAY BE EXPOSED.

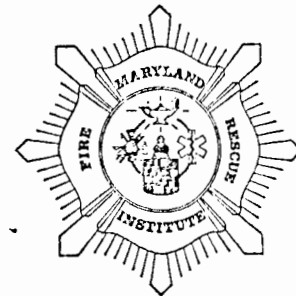
THE EMERGENCY ACTION TEAM CONSISTS OF APPROXIMATELY 150 PERSONS OF WHICH A MINIMUM OF 35 ARE IN THE PLANT AREA, AVAILABLE FOR RESPONSE, AT ANY GIVEN TIME. THIS GROUP WILL MAINTAIN EXPERTISE IN PREVENTING, CONTROLLING, AND SUPPRESSING ALL TYPES OF EMERGENCY OR CALAMITY, EITHER INCIPIENT OR CATASTROPHIC IN NATURE.

EXHIBIT N-1
PERSONNEL TRAINING
FIRE TRAINING

January	Plant CO2 systems -- all maintenance people, with Tom Filizzi.
February	Study plant layout of fire valves and the area they control. Also practice the proper use of all fire gear.
March	Electric fires and how to fight them. Also substations.
April	Study all gas valves, the area they control, and steps to take in case of fire or other emergency.
May	Outside fire training with foam and fire hoses.
June	Plant CO2 systems--all maintenance people, with Tom Filizzi.
July	Fire drill with local fire company, and plant tour.
August	Cast House fire drills around furnaces.
September	Study plant layout of fire valves and the area they control. Also practice the proper use of all fire gear.
October	Outside fire training with foam and fire hoses.
November	Office fire drill and valves control for the area. Also lab fire drill and protection of other equipment within the area.
December	Classroom training and movies, and cleanup after each fire.



University of Maryland Maryland Fire and Rescue Institute



CERTIFIES THAT

RICHARD D. ELSÉN

HAS ATTENDED AND PARTICIPATED IN THE

Industrial Fire Protection Management Seminar


PROGRAM COORDINATOR


DIRECTOR

COMPLETED THESEVENTH..... DAY OF
APRIL.....1981 AT COLLEGE PARK, MARYLAND.

PERSONNEL TRAINING

EXHIBIT N-2



University of Maryland Maryland Fire and Rescue Institute



CERTIFIES THAT

CLAIR M. BECKER

HAS ATTENDED AND PARTICIPATED IN THE

Industrial Firefighters School

EXHIBIT N-3
PERSONNEL TRAINING


PROGRAM COORDINATOR


DIRECTOR

COMPLETED THEFIFTH..... DAY OF
...JUNE.....1981 AT COLLEGE PARK, MARYLAND.



University of Maryland Maryland Fire and Rescue Institute



CERTIFIES THAT

DAVID L. McDONALD

HAS ATTENDED AND PARTICIPATED IN THE

Industrial Firefighters School

EXHIBIT N-4
PERSONNEL TRAINING


PROGRAM COORDINATOR


DIRECTOR

COMPLETED THE FIFTH DAY OF
... JUNE 1981 AT COLLEGE PARK, MARYLAND.

EXHIBIT N-5

Personnel Training

HOWMET ALUMINUM CORPORATION - MILL PRODUCTS DIVISION

INDIVIDUAL FIRE BRIGADE TRAINING RECORD

NAME _____ CLOCK No. _____ DATE _____

SUBJECT _____

LOCATION _____

LENGTH OF SESSION _____ MIN.

REMARKS: _____

/S/ Trainee _____ Title _____

/S/ Instructor _____ Title _____

INTRODUCTION

Effective management of emergency operations at Mill Products Division is dependent upon the coordination and cooperation of the Emergency Management Committee, Emergency Action Team, and Resources Staff or any public agency that may be called upon to perform actions in conjunction with an incident. Each occurrence may differ by type, area, location, or extent of damage; but the basic responsibilities of involved groups remain the same, and the following procedures are established in order to save life and property.

The purpose of this plan is to serve as a guide for responding personnel to assure the coordinated efforts of their activities. It is not intended to limit or restrict initiative, judgement, or independent action required to provide appropriate operations. This plan cannot prescribe for every conceivable action, and therefore, it will be necessary to draw upon sound judgement to cope with unusual situations.

EXHIBIT 0-1

PPC Plan - Items 1-A & 1-D

General Description of the Industrial Activity

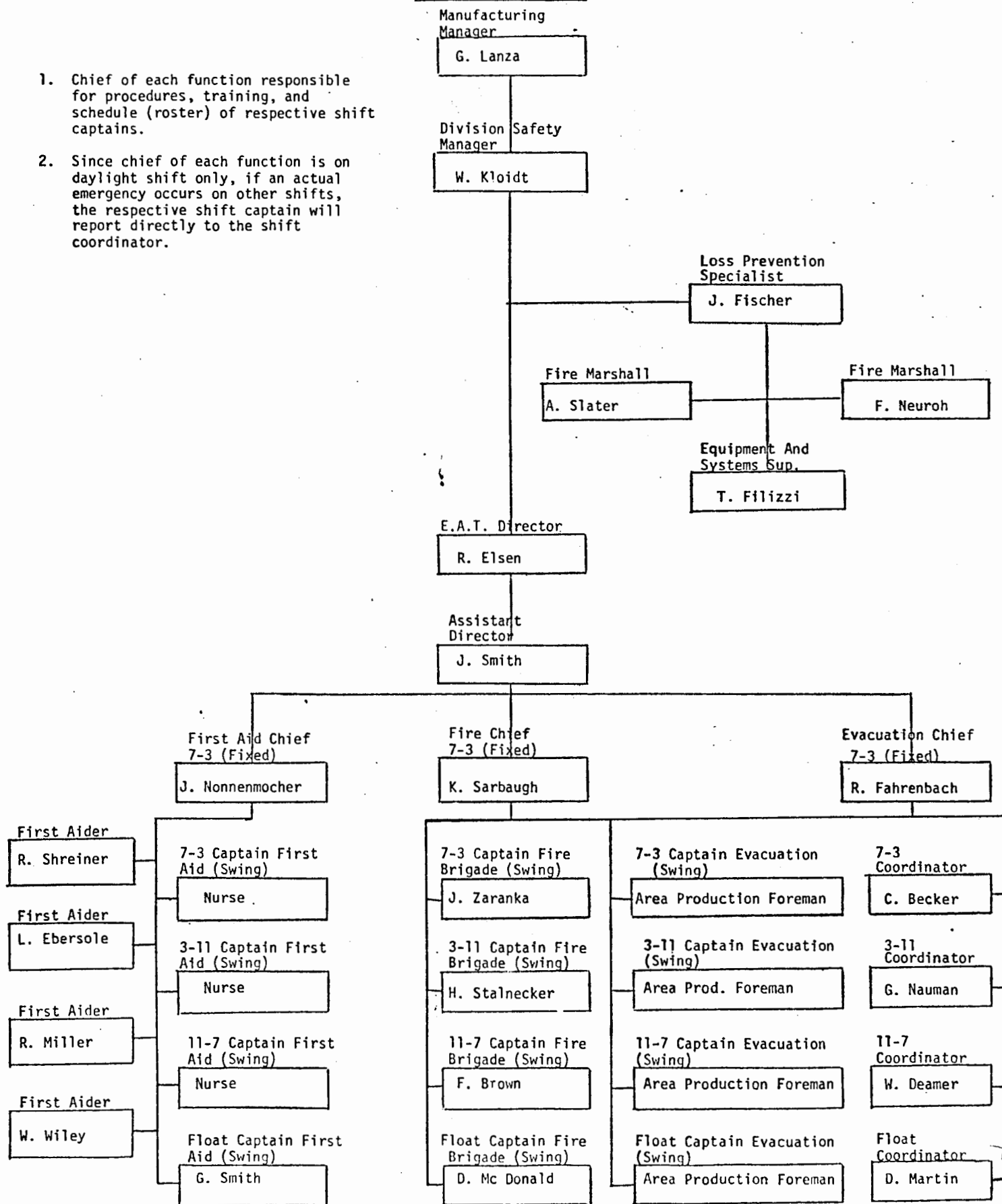
Howmet Mill Products Division is a producer of aluminum coil, sheet and blanks, all for further fabrication and processing by others. The manufacturing operations include Direct Chill Casting, Hot Rolling, Cold Rolling, Slitting, Coil Coating, Embossing, and Blanking. The major wastes generated are a 5% soluble oil/95% deionized water emulsion from the Hot Rolling operation, and paint/solvent waste from cleaning operations in coil coating.

EXHIBIT 0-2

PPC Plan - Item 1-B

EMERGENCY ACTION TEAM

1. Chief of each function responsible for procedures, training, and schedule (roster) of respective shift captains.
2. Since chief of each function is on daylight shift only, if an actual emergency occurs on other shifts, the respective shift captain will report directly to the shift coordinator.



MATERIAL & WASTE INVENTORY

- A. Location, sources, toxicological, health, and safety information, safety data sheets, first aid, etc., of all raw chemical materials, commercial chemical products, listed in "Toxicology Manual," (approx. 2" thick) in Dispensary. Available 24 hours per day. Noted on page 16 of Emergency manual.
- B. Process wastes with the potential for causing environmental degradation or endangerment of public health and safety through accidental releases:
 - 1. Paint Line - paint/solvent wastes - Ignitable - 10,000 gal. tank--southeast corner of Paint Line Bldg.
 - 2. Hot Mill - 5% water soluble oil/95% water emulsion, 2 - 75,000 gal. tanks inside north wall of 3-Stand Hot Mill oil room. No E.P. Toxicity.
 - 3. Cold Mill - Floor scrubber wastes, ground water, mineral oil. Very slight chance of ignitability. 6600 gallon underground tank south of spirits tanks.
 - 4. Jeep Shop - Scrubber wastes, steam cleaning wastes and detergents. Non-hazardous. 6,000 gal. tank under steam cleaning station.

S.P.C.C. PLAN
INSPECTION RECORD

Howmet Aluminum Corporation
Mill Products Division
Lancaster, Pennsylvania

Each listed source is to be inspected once per month, some more frequently, especially after a heavy rain. If there is sufficient liquid in the containment to maintain pump suction for 1 minute or more, it is to be pumped into the portable waste truck tank or to the Cold Mill Underground Waste Tank (submarine).

Date _____

<u>Source</u>	<u>Inspected</u>	<u>Pumped</u>
A. Building "A" Compressor Room Blowdown	_____	_____
B. Old Cast House Fuel Oil Storage	_____	_____
C. Main Plant Compressor Room Blowdown	_____	_____
D. Spirits Solvent Storage - A (3-2000 gal. tanks)	_____	_____
E. Fill Station for New Cast House Fuel Oil Tanks	_____	_____
F. Hot Mill Fuel Oil Storage	_____	_____
G. Pump House for Hot Mill Fuel Oil	_____	_____
H. Liquid Incinerator Tank Farm	_____	_____
I. Drain Pad for 3 SHM Chip Boxes	_____	_____
J. Fill Stations for 2 - 500,000 Gal. Fuel Oil Tanks	_____	_____
K. Cast House Air Compressor Blowdown	_____	_____

Inspector's Signature _____

22 Aug. 74
Rev. 1: 26 July 76
Rev. 2: 14 Sept. 79

Preventive Maintenance

A. Lagoon Discharge

- 1) Recorder - monitors and graphs flow, pH and temperature of lagoon discharge.
- 2) Routine inspections daily.
- 3) Calibrated weekly.
- 4) Adjustment, repair and replacement of parts--as needed.
- 5) All readings are recorded and tabulated. Graphic recordings are kept on file.

B. Storage Tanks

All storage tanks are equipped with catchment and/or sump pump which are regularly inspected and kept in working order. (Refer to Inspection and Monitoring Program).

EXHIBIT 0-6

PPC Plan - Item 1-H

HOUSEKEEPING PROGRAM

- A. Chemicals and raw materials kept in racks, marked aisles, diked tanks, storage cabinets.
- B. Mobile sweeping machine in operation 8 hours per day--all areas inside and outside.
- C. Mobile scrubbing machine in operation 8 hours per day--Hot Mill and Cold Mill areas.
- D. Refuse pickup by contractor on regular basis, 30 cu. yd. box.

EXHIBIT 0-7

PPC Plan - Item 1-J

EXTERNAL FACTORS

COMMUNICATIONS

ADJOINING PROPERTIES

Atlantic Breeders Cooperative 1575 Apollo Drive	569-0411
Parr Equipment 1531 Apollo Drive	393-1728
Amtrak (police) N. Queen St. & McGovern Ave.	291-5005
Wolf Motor Company 1485 Manheim Pike	299-4331
Park City Center 146 Park City Center	393-3851
Famous Recipe Fried Chicken 1470 Manheim Pike	397-2915
Nicholas Garboczi 1301 Shreiner Road	394-7923 Residence 394-9619 Shop

INTERNAL & EXTERNAL COMMUNICATIONS

The Emergency Action Team is responsible for responding to all emergencies. To call the team into action the following guidelines should be followed.

1. Dial 12222(Plant Page System)
2. For fire emergency announce - CODE RED and department area number.
3. For injury emergency announce - CODE BLUE and department area number.

Example: CODE RED, area 11 (repeat)
CODE BLUE, area 13 (repeat)

Department Areas:

- 11 - Cast House
- 12 - Hot Mill
- 13 - Cold Mills
- 14 - Mill Finishing
- 15 - Blanking
- 16 - Shipping
- 17 - Paint Line
- 18 - Annealing
- 21 - Receiving
- 32 - Laboratory
- 40 - Engineering
- 41 - Machine Shop
- 42 - Mechanical Maintenance
- 43 - Forklift Shop
- 44 - Electrical Shop
- 46 - Storeroom
- 47 - Hot Mill/Paint Line Maintenance
- 54 - Guard House Area

(Areas not listed may be announced according to specific location.)

COMMUNICATIONS

EXTERNAL

UTILITIES EMERGENCY

UNITED GAS IMPROVEMENT CO. 299-7281

PENNSYLVANIA POWER & LIGHT CO. 569-6411
387-6181

SUBURBAN PROPANE CO. 898-2267
898-2268
464-3282

AIR PRODUCTS CO. (NITROGEN)
ALLENTOWN (215) 395-4911
LANCASTER 393-9961

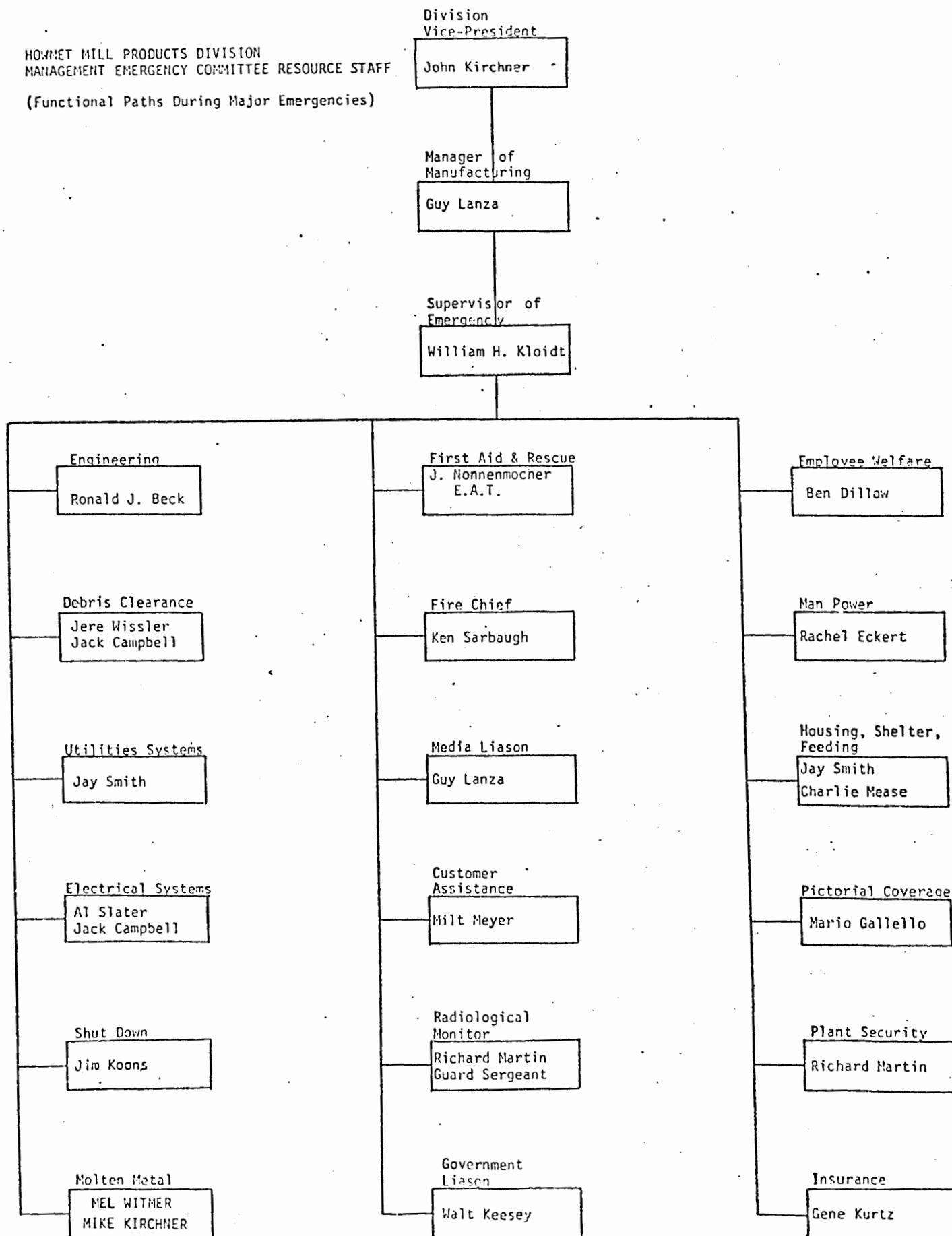
LANCASTER WATER WORKS DAY 397-3501
NIGHT 392-5311
392-5312

TEXAS EASTERN TRANSMISSION LINE - FRUITVILLE PIKE 569-9361
MARIETTA 426-3817

MOBILE OIL COMPANY DAY 299-4261
NIGHT 626-6051

PPC Plan Item 1-M

HOWMET MILL PRODUCTS DIVISION
MANAGEMENT EMERGENCY COMMITTEE RESOURCE STAFF
(Functional Paths During Major Emergencies)



RESOURCE STAFF ACCOUNTABILITY

Supervisor of Emergency	Coordinate resource staff activities
Plant Security	Provide special services related to protection of personnel and property from natural hazards, vandalism, theft, etc. Provide early warning of natural hazards.
Man Power	Determine the impact on manufacturing personnel in relation to emergency conditions at the plant and in surrounding communities.
Employee Welfare	Gather pertinent information conditional to the safety of employees and their travel to and from work. Prepare coverage for telephone answering service.
Radiological Monitor	Survey radiation, wind direction, and weather conditions. Observe changing weather conditions and forecasts.
Molten Metal	Formulate plans to clear furnaces for shut-down. Center activities towards completion of casting and melting operations.
Shut Down	Oversee completion of all manufacturing operations, including cooling of furnaces, employee work schedules, etc.
First Aid & Rescue	Insure that first aid coverage is adequate up until completion of emergency or shut down.
Fire Chief	Maintain adequate manpower to safeguard the plant during emergency.
Debris Clearance	Clear areas of material resulting from flood, storm, or explosion. Assure access to substations and entrance points to plant property and buildings. Plywood and canvas covers.
Engineering	Evaluate damage and the safe integrity of buildings and machinery. Coordinate electrical and gas-oil systems emergencies.

PPC Plan - Item 1-N (Cont'd.)

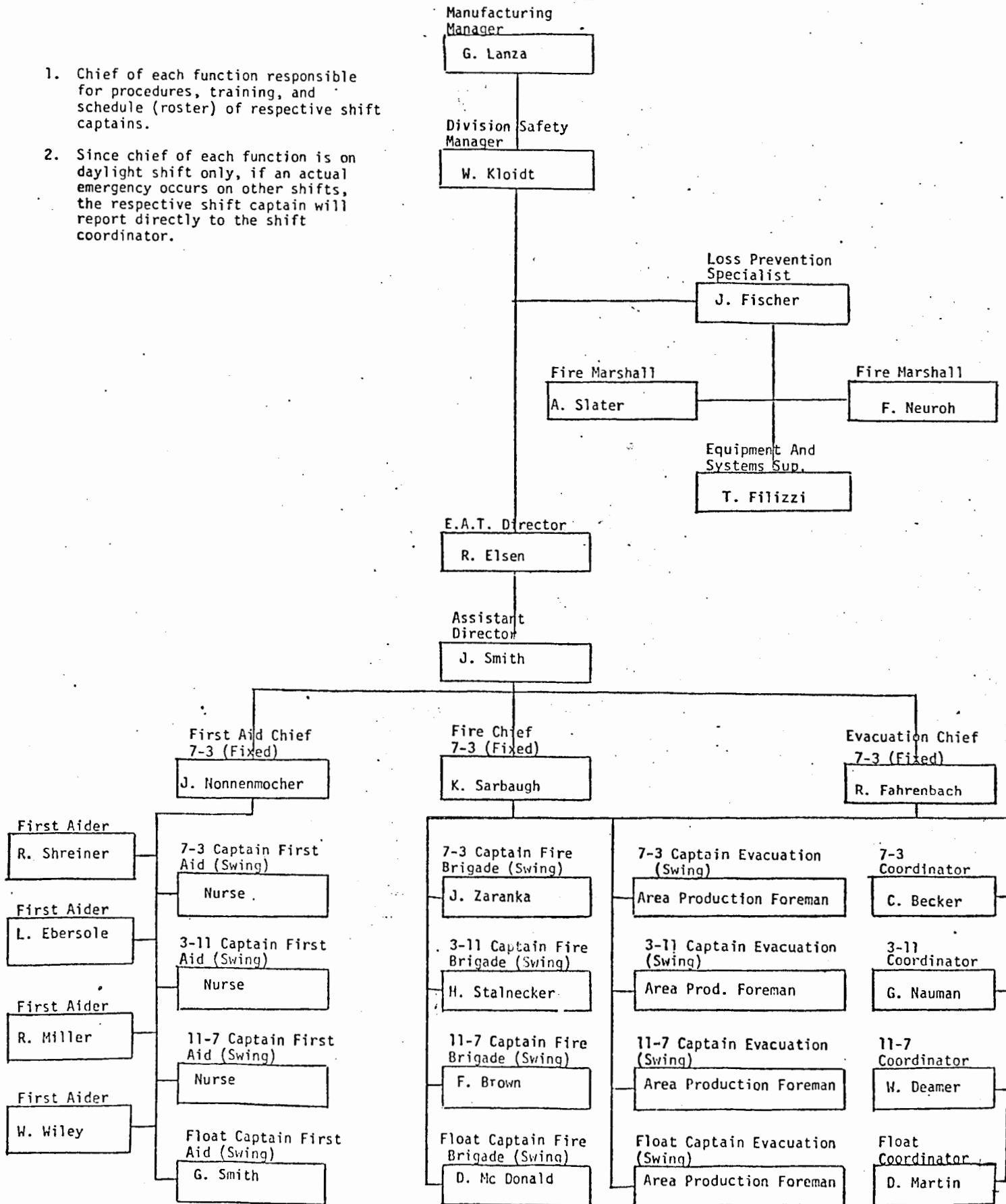
RESOURCE STAFF ACCOUNTABILITY (cont'd.)

Information Coordinator	Direct acquired facts to and from all resource people on the Management Emergency Committee.
Government Liason	Make contacts with related government agencies and authorities concerned with existing emergency conditions.
Insurance	Gather information pertinent to needs of insurance claim personnel.
Customer Assistance	Perpare format for telephone information to calling customers. Provide answering service for customer related calls.
Housing, Shelter, Feeding	Maintain needs of skeleton crews, fire watch and security personnel.
Media Liason	General public relations.
Pictorial Coverage	Assist Insurance, Engineering and other resource people in providing historical information.
Electrical Systems	Assess damage to equipment, notify effected departments of emergency shut-downs, use of emergency generators, etc.
Gas & Oil Systems	Assess damage, assure safe shut-down, heat for plant and sprinkler areas. Utilities shut off.
Construction	Liason for contractors working in plant areas.

PPC Plan - Item 1-0

EMERGENCY ACTION TEAM

1. Chief of each function responsible for procedures, training, and schedule (roster) of respective shift captains.
2. Since chief of each function is on daylight shift only, if an actual emergency occurs on other shifts, the respective shift captain will report directly to the shift coordinator.



-----EMERGENCY AMBULANCE, POLICE, OR FIRE DEPT. - DIAL 911-----

COMMUNICATIONS

EXTERNAL - SAFETY - EMERGENCY

POLICE

MANHEIM TOWNSHIP POLICE ADMINISTRATION	569-6401
MANHEIM TOWNSHIP POLICE EMERGENCY	299-4321
LANCASTER STATE POLICE BARRACKS	299-0441
LANCASTER COUNTY POLICE EMERGENCY	299-4321
LANCASTER CITY POLICE - EMERGENCY	394-7211
LANCASTER CITY POLICE - ADMINISTRATION	394-2141

HOSPITALS

LANCASTER GENERAL HOSPITAL	299-5511
ST. JOSEPH'S HOSPITAL	291-8211
LANCASTER OSTEOPATHIC HOSPITAL	397-3711
LANCASTER GENERAL INTENSIVE CARE UNIT	299-0111
ST. JOSEPH'S INTENSIVE CARE UNIT	399-1119

FIRE PROTECTION

SOUTHERN MANHEIM TOWNSHIP FIRE DEPARTMENT	299-2311
LANCASTER COUNTY CONTROL (Fire)	299-5501
LANCASTER CITY FIRE DEPARTMENT - EMERGENCY	299-2334
LANCASTER CITY FIRE DEPARTMENT - ADMINISTRATION	299-2334
LANCASTER COUNTY CIVIL DEFENSE	299-8373

CRISIS INTERVENTION	394-2631
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WEATHER

HARRISBURG AREA	811-782-4432
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POISON CONTROL	299-4546
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PENN DOT - Hazardous Materials Board	(717) 787-7445
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CHEMTREC -	1-800-424-9300
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COAST GUARD NATIONAL RESPONSE CENTER (Spills)	1-800-424-8802
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PENNA. DER (Hazardous Material Spills)	1-717-787-4343
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EMERGENCY EQUIPMENT

- A. Absorbent materials are available in all plant areas. Large quantities on hand in company storeroom.
- B. Backhoe and tank trucks available through Outside Maintenance Department.
- C. Fire Fighting Equipment - CO₂ extinguishers are posted in all plant locations. Cardox Transittank portable fire fighting apparatus is found in Cold Mill Oil Cellar Service Area.
- D. Geiger Counter - can be found at main security desk.
- E. Cherry Picker - located at the east end of Hot Mill at rear of electrical room.
- D. Pumps, Cutting & Welding Equipment, Tools - located in Hot Mill Maintenance Area at rear of Hot Mill and in General Maintenance Area.

EXHIBIT 0-15

PPC Plan - Item 1-R

DEPARTMENT EVACUATION CONCEPT

Department	<u>Paint Line</u>
Number of Employees (per shift maximum)	<u>11</u>
Number of Group Leaders	<u>0</u>
Number Foremen Per Shift	<u>1</u>

PHASE 1 - ALERT

- a. Department Intercom
- b. Plant Page

PHASE 2 - MOBILIZATION

Rewind and payoff operators will turn off hydraulic systems and notify electrical department to shutdown main power supply. Rewind and lab personnel will exit building at west end. Payoff and relief people will exit east end of building. Coaters, mixers, and scales people will exit at the door on the south wall near the lunch room. Circumstances may warrant exit of building via the nearest doorway along the north side of the building. Foremen will check office areas, toilet facilities and docks for truck drivers.

PHASE 3 - RECEPTION

All personnel will proceed to the hot mill maintenance office trailer along the south side of the paint line building, telephone 302, 303.

PHASE 4 - ACCOUNTABILITY

The shift foreman will make a head count and report to the guardhouse, extension 471.

EXHIBIT 0-16

PPC Plan - Item 1-S

EMERGENCY RESPONSE CONTRACTORS

Listed below are local area contractors available upon request to render services as needed in the event hazardous or dangerous spill.

A) B. R. Kreider & Sons, Inc. 898-7651

Will provide excavating, paving, filling, grading and utility construction.

B) W. W. Stauffer & Sons 393-9904

Will provide concrete and carpentry work for dykes and shoring.

C) American Recovery 1-301-388-0837

Will provide tankers with pumps to remove and spills of large volume.

EXHIBIT P

• PPC Plan - Page 9 of 12

Section (264) (0) (3)

CLOSURE PLAN

For 10,000 Gallon Paint/Solvent Waste Tank on Howmet Property

1. Remove all remaining waste, ship to current TSD facilities.
2. Clean inside and outside surfaces, mixer, heaters, to enable tank to be used for future purposes.

Estimated cost of closure \$10,000

Cleanup to be done by professional tank cleaning contractor.

Postclosure requirements unnecessary.

J.F. Fischer
January 12, 1983

ENDORSEMENT**PAGE 1**
**Royal
Insurance
COMPANY**

Type policy number only, in this section above the heavy line, IF issued with policy and attachment stated in policy declarations.

Unless otherwise stated, this endorsement forms a part of the policy to which attached as of issue, provided such attachment is stated in the policy declarations. Otherwise, this endorsement is issued for attachment to and forms a part of the policy numbered below, effective only on the date indicated on this endorsement but at the same time or hour of the day as the policy became effective.

SIGNED BY

AUTHORIZED REPRESENTATIVE

ROYAL INSURANCE CO. OF AMERICA

PREMIUM

☐ Add'l. ☐ Return \$

END. EFF. DATE

7/1/82

POLICY SYMBOL & NUMBER

PTG 319161

Named Insured (and address, zip code, when necessary for mailing)

PECHINEY UGINE KUHLMANN CORP.
475 STEAMBOAT RD.
GREENWICH, CONN. 06830

Producer (and address, zip code, for mailing)

CRAIG M. FERGUSON & CO. INC.
12 E. 41ST ST.
NEW YORK, N.Y. 10017

HAZARDOUS WASTE FACILITY LIABILITY ENDORSEMENT

1. THIS ENDORSEMENT CERTIFIES THAT THIS POLICY PROVIDES LIABILITY INSURANCE COVERING BODILY INJURY AND PROPERTY DAMAGE IN CONNECTION WITH THE INSURED'S OBLIGATION TO DEMONSTRATE FINANCIAL RESPONSIBILITY UNDER 40CFR264.147 OR 265.147.

THE COVERAGE APPLIES AT:

PLANT

HOWMET ALUM. CO.
MILL PRODUCTS DIV.
MANHEIM PIKE
BX. 3167
LANCASTER, PA. 17604

EPA
**IDENTIFICATION
 NUMBER**
PAD 049 029 697

FOR SUDDEN ACCIDENTAL OCCURRENCES. THE LIMITS OF LIABILITY ARE \$1,000,000 PER OCCURRENCE, \$2,000,000 ANNUAL AGGREGATE EXCLUSIVE OF LEGAL DEFENSE COSTS.

THE INSURANCE AFFORDED WITH RESPECT TO SUCH OCCURRENCES IS SUBJECT TO ALL OF THE TERMS AND CONDITIONS OF THE POLICY; PROVIDED, HOWEVER, THAT ANY PROVISIONS OF THE POLICY INCONSISTENT WITH SUBSECTIONS (A) THROUGH (E) OF THIS PARAGRAPH ARE HEREBY AMENDED TO CONFORM WITH SUBSECTIONS (A) THROUGH (E):

- (A) BANKRUPTCY OR INSOLVENCY OF THE INSURED SHALL NOT RELIEVE THE INSURER OF ITS OBLIGATIONS UNDER THE POLICY TO WHICH THIS ENDORSEMENT IS ATTACHED.
- (B) THE INSURER IS LIABLE FOR THE PAYMENT OF AMOUNTS WITHIN ANY DEDUCTIBLE APPLICABLE TO THE POLICY, WITH A RIGHT OF REIMBURSEMENT BY THE INSURED FOR ANY SUCH PAYMENT MADE BY THE INSURER. THIS PROVISION DOES NOT APPLY WITH RESPECT TO THAT AMOUNT OF ANY DEDUCTIBLE FOR WHICH COVERAGE IS DEMONSTRATED AS SPECIFIED IN 40CFR264.147(F) OR 265.147(F).
- (C) WHENEVER REQUESTED BY A REGIONAL ADMINISTRATOR OF THE U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA), THE INSURER AGREES TO FURNISH TO THE REGIONAL ADMINISTRATOR A SIGNED DUPLICATE ORIGINAL OF THE POLICY AND ALL ENDORSEMENTS.

ES

ENDORSEMENT

PAGE 2



Type policy number only, in this section above the heavy line, if issued with policy and attachment state in policy declarations.

Unless otherwise stated, this endorsement forms a part of the policy to which attached as of issue, provided such attachment is stated in the policy declarations. Otherwise, this endorsement is issued for attachment to and forms a part of the policy numbered below, effective only on the date indicated on this endorsement but at the same time or hour of the day as the policy became effective.

SIGNED BY

Linda E. Cary
AUTHORIZED REPRESENTATIVE

ROYAL INSURANCE CO. OF AMERICA

PREMIUM

☐ Add'l. ☐ Return \$
END. EFF. DATE
(MO. DAY, YR.)

7/1/82

POLICY SYMBOL & NUMBER

PTG 319161

Named Insured (and address, zip code, when necessary for mailing)

PECHINEY UGINE KUHLMANN

Producer (and address, zip code, for mailing)

CRAIG M. FERGUSON & CO. INC.

- (D) CANCELLATION OF THIS ENDORSEMENT, WHETHER BY THE INSURER OR THE INSURED, WILL BE EFFECTIVE ONLY UPON WRITTEN NOTICE AND ONLY AFTER THE EXPIRATION OF SIXTY (60) DAYS AFTER A COPY OF SUCH WRITTEN NOTICE IS RECEIVED BY THE REGIONAL ADMINISTRATOR(S) OF THE EPA REGION(S) IN WHICH THE FACILITY(IES) IS (ARE) LOCATED.
- (E) ANY OTHER TERMINATION OF THE ENDORSEMENT WILL BE EFFECTIVE ONLY UPON WRITTEN NOTICE AND ONLY AFTER THE EXPIRATION OF THIRTY (30) DAYS AFTER A COPY OF SUCH WRITTEN NOTICE IS RECEIVED BY THE REGIONAL ADMINISTRATOR(S) OF THE EPA REGION(S) IN WHICH THE FACILITY(IES) IS (ARE) LOCATED.

ATTACHED TO AND FORMING PART OF POLICY NO. PTG 319161 ISSUED BY ROYAL INSURANCE COMPANY OF AMERICA, HEREIN CALLED THE INSURER, OF 150 WILLIAM STREET, NEW YORK, N.Y. 10038 TO PECHINEY UGINE KUHLMANN CORP. OF 475 STEAMBOAT RD., GREENWICH, CONN. 06830 THIS 1ST DAY OF JULY 1982. THE EFFECTIVE DATE OF SAID POLICY IS THE 1ST DAY OF JULY 1982.

I HEREBY CERTIFY THAT THE WORDING OF THIS ENDORSEMENT IS IDENTICAL TO THE WORDING SPECIFIED IN 40CFR264.151(1) AS SUCH REGULATION WAS CONSTITUTED ON THE DATE FIRST ABOVE WRITTEN, AND THAT THE INSURER IS LICENSED TO TRANSACT THE BUSINESS OF INSURANCE, OR ELIGIBLE TO PROVIDE INSURANCE AS AN EXCESS OR SURPLUS LINES INSURER, IN ONE OR MORE STATES.

SIGNATURE OF AUTHORIZED REPRESENTATIVE OF INSURER.